

FCA Canada Inc.  
Brampton Assembly Plant

TRA Plan Summary December 2012

Public Reporting Under O. Reg. 455/09  
Public Plan Summary

Chrysler Canada Inc.  
Brampton Assembly Plant

December 14, 2012

## **ENVIRONMENTAL REPORTING:**

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The National Pollution Release Inventory (NPRI) is Canada's legislated, publically accessible inventory of releases (to air, water and land), disposals and transfers for recycling that are associated with industrial activity. Over 84,000 facilities report to the NPRI on more than 300 listed substances. Chrysler Canada Inc. has been reporting in accordance with federal NPRI regulations since its inception in 1992.

Additionally, beginning in 2010, the Toxics Reduction Act requires certain facilities in Ontario to prepare and publish toxic substance reduction plans, though implementation of the plans is voluntary. The first report under the Toxic Reduction Act and Ontario Regulation 455/09 was required in June 2011.

Regulation 455 requires facilities to report on their use and creation of certain "substances of concern". Currently the list of substances of concern under the Toxics Reduction Act includes all of the substances on the NPRI list. Therefore, in addition to reporting releases, disposals and transfers of substances listed under NPRI, Ontario facilities must report on their use and creation of these substances along with the amount of the substance contained in each product.

Vehicles are made by all manufacturers in a similar manner globally. All vehicles sold in Canada must meet the same consumer performance expectations for the Canadian market as for export markets where they are sold. To meet these expectations, many of the substances listed in Ontario Regulation 455/09 as "substances of concern" are utilized in the manufacture of all vehicles, including those assembled elsewhere and imported to Ontario for sale.

## BASIC FACILITY INFORMATION

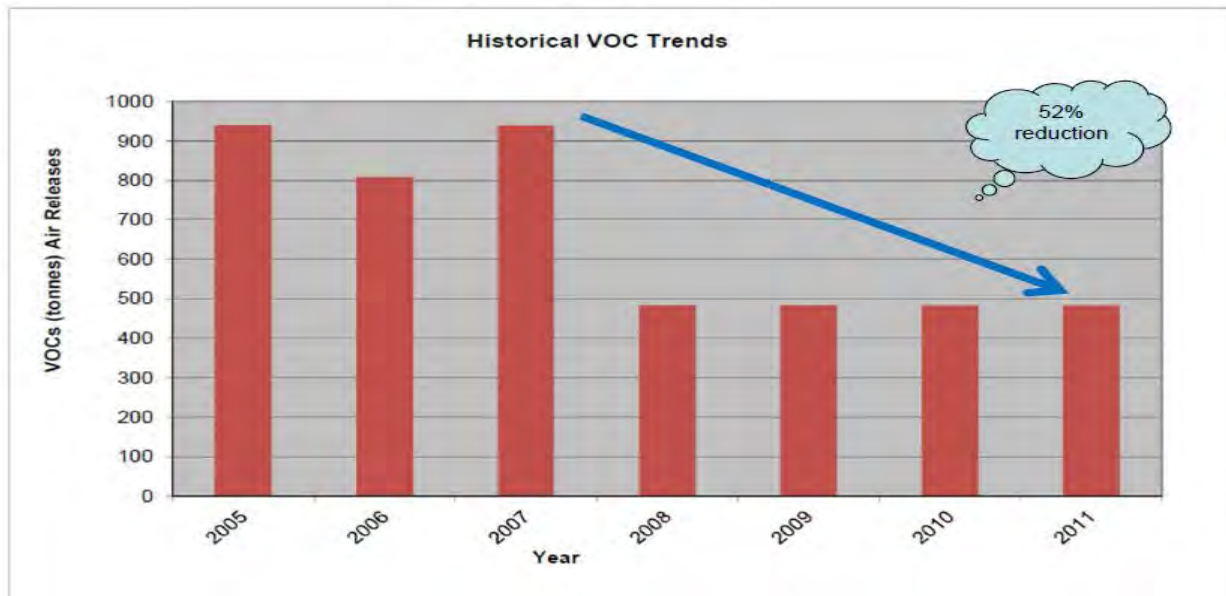
<b>BASIC FACILITY INFORMATION</b>		
<b>Substances Included in the Plan</b>		
▪ Sulphuric Acid (7446-60-6)		▪ Zinc (CAS No. 7440-66-6)
▪ Xylene (CAS No. 1330-20-7)		▪ Methanol (CAS No. 67-56-1)
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	Chrysler Canada Inc.	
<b>Facility Name</b>	Brampton Assembly Plant	
<b>Facility Address</b>	<b>Physical Address:</b>	<b>Mailing Address:</b>
	2000 Williams Parkway Brampton, ON L6S 6B3	Same as physical address
<b>Spatial Coordinates of Facility</b>	UTM Northing 4844800, UTM Easting 602600 (NAD 1983)	
<b>Number of Employees</b>	4355	
<b>NPRI ID</b>	4173	
<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>	3361 (Motor Vehicle Manufacturing)	
<b>6 Digit NAICS Code</b>	336110 (Automotive and Light Duty Motor Vehicle Manufacturing)	
<b>Facility and Planner Contact Information</b>		
<b>Facility Public Contact</b>	Sue Forest	Chrysler Canada Inc.
	Email: <a href="mailto:sf3@chrysler.com">sf3@chrysler.com</a>	3939 Rhodes Drive CIMS 242-01-03 Windsor, On N9A 4H6
	Phone: (519) 973-2864	

## EXISTING ENVIRONMENTAL MANAGEMENT SYSTEMS

Chrysler Canada Inc. is committed to the responsible management of all of its facilities and operations. This includes a proactive approach towards protecting public health and the natural environment through existing and planned environmental and sustainability initiatives. All Canadian operations have implemented comprehensive environmental management systems including Pollution Prevention commitments through World Class Manufacturing (WCM) and ISO 14001 certified Environmental Management Systems. Through these initiatives, each Chrysler facility intends to reduce or minimize its use and/or creation of each listed substance wherever possible. More specifically, the Brampton Assembly Plant (BAP) is dedicated to reducing its use and creation of toxic substances by continually striving for operational and process efficiency, innovation, and conservation.

In fact, Chrysler Group LLC as a whole has adopted a global approach such that each facility has defined a standard process-based Environment Management System that identifies a process for continuous improvement, ongoing measurement of metrics tracked through scorecards and use of objective statements. The key to the success of the ISO 14001 is that metrics are reviewed by a third party accredited body to ensure that the Environment Management Systems strive for continuous improvement, meet or exceed regulatory standards and document all activities in accordance with the procedures outlined in the system.

As an example of the continuous improvement efforts that have been implemented within BAP, the following graph outlines the trends of total VOCs releases to air (in tonnes). The trend shows data from 2005 to 2011 and highlights that BAP has already reduced VOCs releases from peak historical periods by 52%.



**Figure 2.2:** Historical VOC Air Release Trends

## PLAN SUMMARY FOR EACH SUBSTANCE

<b>SULPHURIC ACID (CAS NO. 7446-60-6)</b>	
<b>Statement of Intent</b>	
In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Policies, BAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
BAP does not intend to implement a reduction option for Sulphuric Acid. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements in an effort to reduce Sulphuric Acid in the future.	
<b>Description of Used of Substance</b>	
Sulphuric Acid is used for pH control in the water treatment facility and cleaning of the phosphate system tanks.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.	

*This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Sulphuric Acid, dated December 14, 2012*

<b>ZINC (CAS NO. 7440-66-6)</b>	
<b>Statement of Intent</b>	
In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Policies, BAP intends to reduce or minimize the use of the listed substance wherever possible.	
<b>Objectives</b>	
Brampton Assembly Plant (BAP) does not intend to implement a reduction option for Zinc. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements in an effort to reduce Zinc in the future.	
<b>Description of Used of Substance</b>	
Zinc is contained with the metal used to manufacture automobiles, and a component of sealers and rust inhibitors.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation is choosing not to implement any of the options. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.	

*This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Zinc, dated December 14, 2012*

<b>XYLENE (CAS NO. 1330-20-7)</b>	
<b>Statement of Intent</b>	
In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Policies, BAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Xylene. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of xylene.	
<b>Description of Used of Substance</b>	
Xylene is a component of coatings, adhesives and sealers used for the manufacturing of automobiles.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Xylene. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.	

*This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Xylene, dated December 14, 2012*



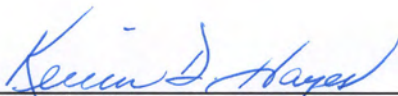
<b>METHANOL (CAS NO. 67-56-1)</b>	
<b>Statement of Intent</b>	
In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Policies, BAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Methanol. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Methanol.	
<b>Description of Used of Substance</b>	
Methanol is the main component within windshield washer fluid as well as a component of coatings, adhesives.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Methanol. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.	

*This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Chrysler Brampton Assembly Plant for Methanol, dated December 14, 2012*

### Certification by Highest Ranking Employee

As of December 14, 2012, I, Kevin Hayes, 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 comply with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

Substance	Date of Certified Plan
▪ Sulphuric Acid (CAS No. 7440-60-6) .....	December 14, 2012
▪ Xylene (CAS 1330-20-7) .....	December 14, 2012
▪ Methanol (CAS 67-56-1) .....	December 14, 2012
▪ Zinc (CAS 7440-66-6) .....	December 14, 2012



Kevin Hayes  
Plant Manager  
Chrysler Canada Inc.  
Brampton Assembly Plant



Mark Vandenberg, Plant Manager  
Project Director / Toxic Substance Reduction Program  
RWDT AIR Inc.

### **Certification by Licensed Planner**

As of December 14, 2012, I, Mark Vanderheyden, certify that I am familiar with the processes at Brampton Assembly Plant 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 toxic substance reduction plans referred to below for the toxic substances and that the plans comply with the Act and Ontario Regulation 455/09 (General) made under that Act.

<u>Substance</u>	<u>Date of Certified Plan</u>
▪ Sulphuric Acid (CAS No. 7440-60-6) .....	December 14, 2012
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Mark Vanderheyden, Planner License #0241  
Project Director / Toxic Substance Reduction Planner  
RWDI AIR Inc.

FCA Canada Inc.  
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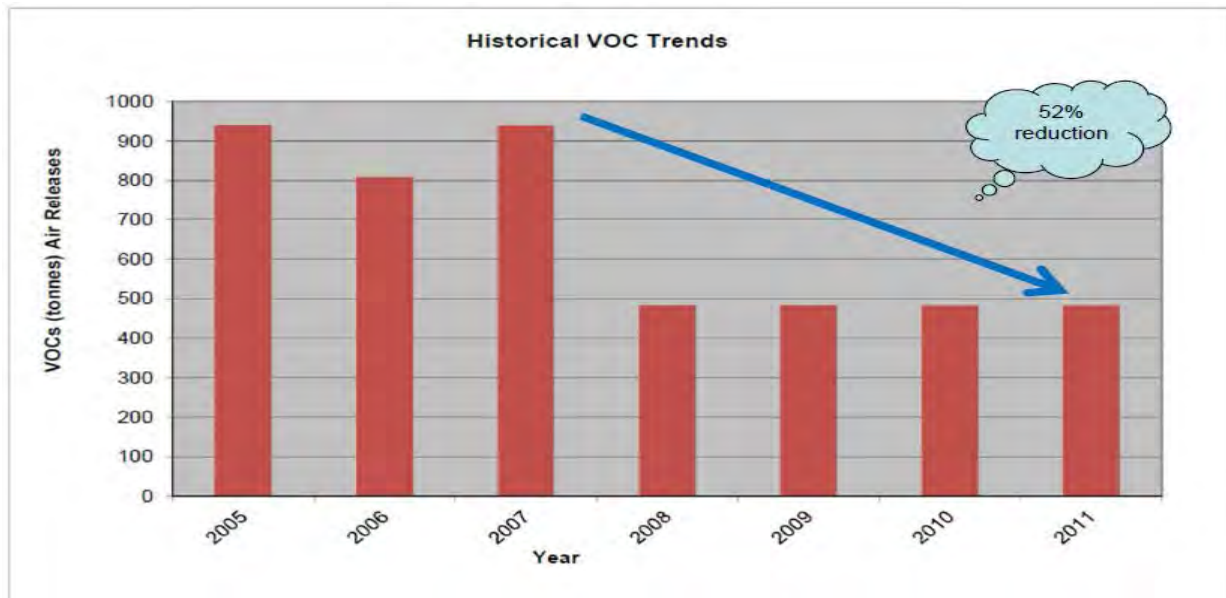
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<b>Facility Name</b>	Brampton Assembly Plant	
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<b>NPRI ID</b>	4173	
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<b>Facility and Planner Contact Information</b>		
<b>Facility Public Contact</b>	Sue Forest	Chrysler Canada Inc.
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**Figure 2.2:** Historical VOC Air Release Trends



## PLAN SUMMARY FOR EACH SUBSTANCE

<b>SULPHURIC ACID (CAS NO. 7446-60-6)</b>	
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<b>Objectives</b>	
BAP does not intend to implement a reduction option for Sulphuric Acid. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements in an effort to reduce Sulphuric Acid in the future.	
<b>Description of Used of Substance</b>	
Sulphuric Acid is used for pH control in the water treatment facility and cleaning of the phosphate system tanks.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.	

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<b>Statement of Intent</b>	
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Brampton Assembly Plant (BAP) does not intend to implement a reduction option for Zinc. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements in an effort to reduce Zinc in the future.	
<b>Description of Used of Substance</b>	
Zinc is contained with the metal used to manufacture automobiles, and a component of sealers and rust inhibitors.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation is choosing not to implement any of the options. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.	

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<b>XYLENE (CAS NO. 1330-20-7)</b>	
<b>Statement of Intent</b>	
In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Policies, BAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Xylene. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of xylene.	
<b>Description of Used of Substance</b>	
Xylene is a component of coatings, adhesives and sealers used for the manufacturing of automobiles.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Xylene. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.	

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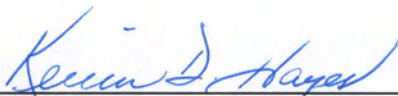
<b>METHANOL (CAS NO. 67-56-1)</b>	
<b>Statement of Intent</b>	
In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Policies, BAP intends to reduce or minimize the use of the listed substances wherever possible.	
<b>Objectives</b>	
Chrysler Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Methanol. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Methanol.	
<b>Description of Used of Substance</b>	
Methanol is the main component within windshield washer fluid as well as a component of coatings, adhesives.	
<b>Rationale for No Option(s) to be Implemented</b>	
In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Methanol. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.	

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### Certification by Highest Ranking Employee

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Kevin Hayes  
Plant Manager  
Chrysler Canada Inc.  
Brampton Assembly Plant



Matt Vandenberg, Plant Manager  
Project Director / Toxic Substance Reduction Program  
RWDA AIR Inc.

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▪ Zinc (CAS 7440-66-6) .....	December 14, 2012



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Mark Vanderheyden, Planner License #0241  
Project Director / Toxic Substance Reduction Planner  
RWDI AIR Inc.

FCA Canada Inc.  
Brampton Assembly Plant

TRA Plan Summary October 2016



FIAT CHRYSLER AUTOMOBILES

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Brampton Assembly Plant

October 26, 2016



## **ENVIRONMENTAL REPORTING:**

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## BASIC FACILITY INFORMATION

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<b>Substances Included in the Plan</b>		
<ul style="list-style-type: none"> <li>Hydrotreated Light Distillates (CAS No. 64742-47-8)</li> </ul>		
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	FCA Canada Inc.	
<b>Facility Name</b>	Brampton Assembly Plant	
<b>Facility Address</b>	<b>Physical Address:</b>	<b>Mailing Address:</b>
	2000 Williams Parkway Brampton, ON L6S 6B3	Same as physical address
<b>Spatial Coordinates of Facility</b>	UTM Northing 4837441, UTM Easting 599405 (NAD 1983)	
<b>Number of Employees</b>	3000	
<b>NPRI ID</b>	4173	
<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>	3361 (Motor Vehicle Manufacturing)	
<b>6 Digit NAICS Code</b>	336110 (Automotive and Light Duty Motor Vehicle Manufacturing)	
<b>Facility and Planner Contact Information</b>		
<b>Facility Public Contact</b>	Sue Forest	FCA Canada Inc.
	Email: <a href="mailto:sue.forest@fcagroup.com">sue.forest@fcagroup.com</a>	3939 Rhodes Drive CIMS 242-01-03 Windsor, On N9A 4H6
	Phone: (519) 973-2864	



## **EXISTING ENVIRONMENTAL MANAGEMENT SYSTEMS**

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FCA Canada Inc. is committed to the responsible management of all of its facilities and operations. This includes a proactive approach towards protecting public health and the natural environment through existing and planned environmental and sustainability initiatives. All Canadian operations have implemented comprehensive environmental management systems including Pollution Prevention commitments through World Class Manufacturing (WCM) and ISO 14001 certified Environmental Management Systems. Through these initiatives, each FCA facility intends to reduce or minimize its use and/or creation of each listed substance wherever possible. More specifically, the Brampton Assembly Plant (BAP) is dedicated to reducing its use and creation of toxic substances by continually striving for operational and process efficiency, innovation, and conservation.

In fact, FCA US LLC as a whole has adopted a global approach such that each facility has defined a standard process-based Environment Management System that identifies a process for continuous improvement, ongoing measurement of metrics tracked through scorecards and use of objective statements. The key to the success of the ISO 14001 is that metrics are reviewed by a third party accredited body to ensure that the Environment Management Systems strive for continuous improvement, meet or exceed regulatory standards and document all activities in accordance with the procedures outlined in the system.

As an example of the continuous improvement efforts that have been implemented within BAP, the following graph outlines the trends of total VOCs releases to air (in tonnes) per vehicle produced. The trend shows data from 2005 to 2012 and highlights that BAP has already reduced VOCs releases from peak historical periods by 50%.

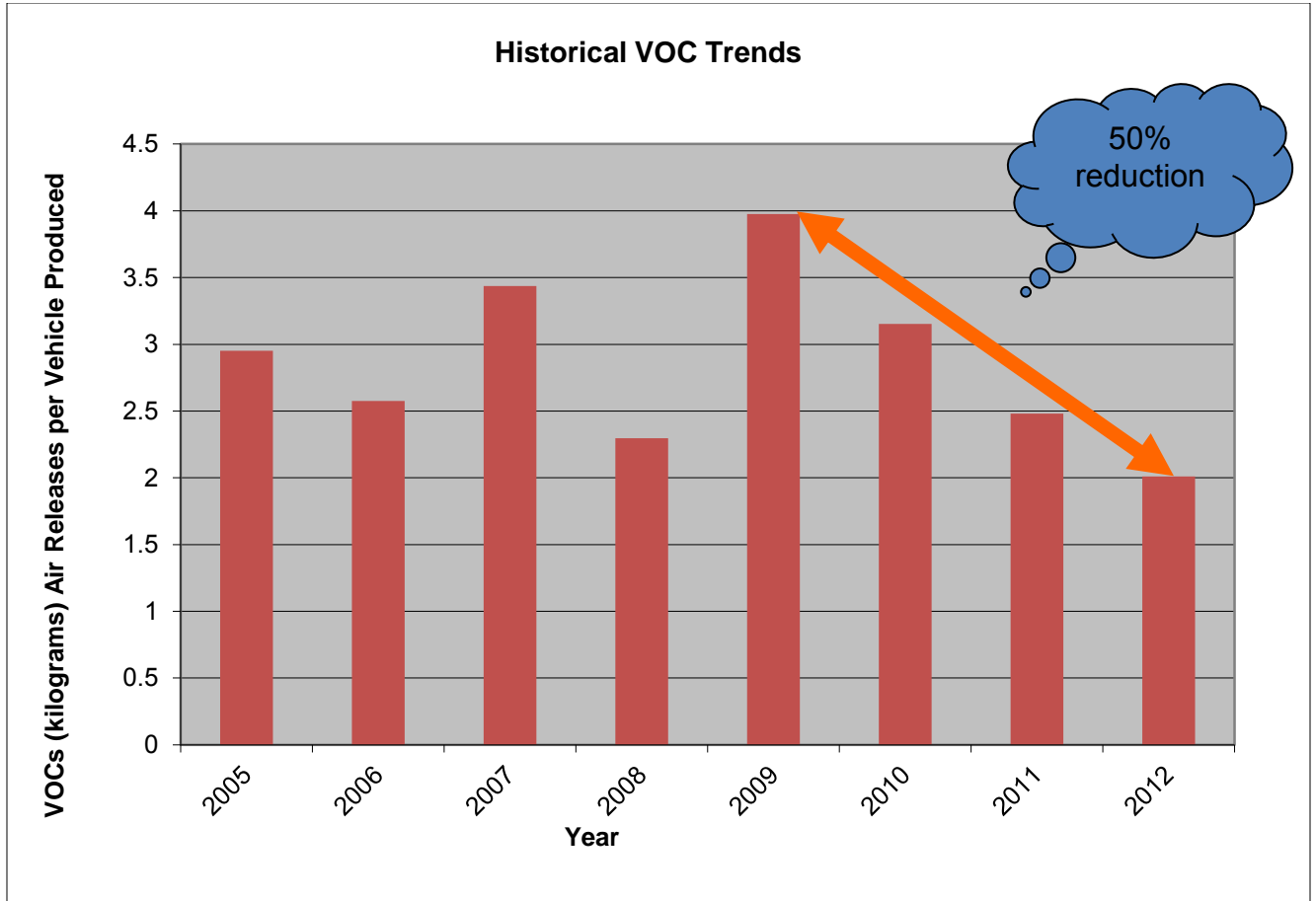


Figure 1: Historical VOC Air Release Trends

## PLAN SUMMARY FOR EACH SUBSTANCE

<b>HYDROTREATED LIGHT DISTILLATES (CAS NO. 64742-47-8)</b>
<b>Statement of Intent</b>
In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Policies, BAP intends to reduce or minimize the use of the listed substances wherever possible.
<b>Objectives</b>
Brampton Assembly Plant (BAP) is not planning to implement a reduction plan specific to Hydrotreated Light Distillates through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in use or discharge of Hydrotreated Light Distillates.
<b>Description of Used of Substance</b>
Hydrotreated Light Distillates is a component of Cleaning solvents.
<b>Rationale for No Option(s) to be Implemented</b>
In accordance with s. 4(1)6 of the Toxic Reduction Act, BAP has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation, is choosing not to implement any of the options through the Toxic Reduction Act and Regulation. BAP has chosen to set objectives and targets for total VOC as a class, which may result in reduction in the use or discharge of Hydrotreated Light Distillates. BAP will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements, as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

*This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Brampton Assembly Plant for Hydrotreated Light Distillates, dated September 27, 2016.*



### Certification by Highest Ranking Employee

As of October 26, 2016, I, Joseph Araujo, 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 comply with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

Substance

- Hydrotreated Light Distillates (CAS No. 64742-47-8)

Date of Certified Plan

October 26, 2016



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Joseph Araujo  
Plant Manager  
FCA Canada Inc.  
Brampton Assembly Plant

**Certification by Licensed Planner**

As of October 26, 2016, I, Brad Bergeron, certify that I am familiar with the processes at Brampton Assembly Plant 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 toxic substance reduction plans referred to below for the toxic substances and that the plans comply with the Act and Ontario Regulation 455/09 (General) made under that Act.

Substance

- Hydrotreated Light Distillates (CAS No. 64742-47-8)

Date of Certified Plan

October 26, 2016



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Brad Bergeron, Planner License #0242  
Senior Project Manager / Toxic Substance Reduction Planner  
RWDI AIR Inc.