

Environment Act Licence

Loi sur l'environnement Licence

Manitoba
Conservation
Conservation
Manitoba



Licence No./Licence n° _____ 2625 R

Issue Date/Date de délivrance _____ October 24, 2003

Revised: January 15, 2004

**IN ACCORDANCE WITH THE MANITOBA ENVIRONMENT ACT (C.C.S.M. c. E125)
THIS LICENCE IS ISSUED PURSUANT TO SECTIONS 10(1) AND 14(3) TO:**

KITCHEN CRAFT OF CANADA; "the Licencee"

for the alteration and continued operation of the Development being a cabinet manufacturing plant in accordance with the Proposal filed March 28, 2001, additional information dated October 15 and 16, 2002, and the Environmental Impact Assessment report dated December 30, 2002, located at 1180 Springfield Road in the City of Winnipeg and subject to the following specifications, limits, terms and conditions:

DEFINITIONS

In this Licence,

"accredited laboratory" means an analytical facility accredited by the Standards Council of Canada (SCC), or accredited by another accrediting agency recognized by Manitoba Conservation to be equivalent to the SCC, or be able to demonstrate, upon request, that it has the quality assurance/quality control (QA/QC) procedures in place equivalent to accreditation based on the international standard ISO/IEC 17025, or otherwise approved by the Director;

"affected area" means a geographical area, excluding the property of the Development;

"approved" means approved by the Director in writing;

"baseline level" means the arithmetic average of total VOCs emitted to the air from the Development for the years 2000, 2001 and 2002;

"boiler" means any combustion equipment fired with fossil fuel, biomass or a by-product derived from fossil fuel, for the purpose of generating hot water, steam, or other media intended for heat transfer;

"Carbon Monoxide (CO)" means an inorganic compound comprised of one atom of carbon and one atom of oxygen;

"dangerous good" means any product, substance or organism designated in the regulations, or conforming with the criteria set out in the regulations, or in any regulation adopted in accordance with The Dangerous Goods Handling and Transportation Act, and includes hazardous wastes;

A COPY OF THE LICENCE MUST BE KEPT ON SITE AT THE DEVELOPMENT AT ALL TIMES

"Director" means an employee so designated pursuant to The Environment Act;

"Environment Officer" means an employee so designated pursuant to The Environment Act;

"natural gas" means a gaseous mixture of combustible hydrocarbons comprised primarily of methane with possible lesser amounts of ethane, propane and/or butane;

"noise nuisance" means a continuous or repeated noise in an affected area, which is offensive, obnoxious, troublesome, annoying, unpleasant or disagreeable to a person:

- a) residing in an affected area;
- b) working in an affected area; or
- c) present at a location in an affected area which is normally open to the members of the public;

if the noise

- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director, and within a 90 day period, from 5 different persons falling within clauses a), b), or c), who do not live in the same household; or
- e) is the subject of at least one written complaint, received by the Director in a form satisfactory to the Director, from a person falling within clauses a), b), or c), and the Director is of the opinion that if the unwanted sound had occurred in a more densely populated area there would have been at least 5 written complaints received within a 90 day period from 5 different persons who do not live in the same household;

"Nitrogen Oxides (NO_x)" means the sum of nitric oxide (NO) and nitrogen dioxide (NO₂) expressed collectively as a nitrogen dioxide equivalent;

"odour nuisance" means a continuous or repeated odour, smell or aroma, in an affected area, which is offensive, obnoxious, troublesome, annoying, unpleasant, or disagreeable to a person:

- a) residing in an affected area;
- b) working in an affected area; or
- c) present at a location in an affected area which is normally open to the members of the public;

if the odour, smell or aroma

- d) is the subject of at least 5 written complaints, received by the Director in a form satisfactory to the Director, and within a 90 day period, from 5 different persons falling within clauses a), b), or c), who do not live in the same household; or
- e) is the subject of at least one written complaint, received by the Director in a form satisfactory to the Director, from a person falling within clauses a), b), or c), and the Director is of the opinion that if the unwanted odour, smell or aroma had occurred in a more densely populated area there would have been at least 5 written complaints received within a 90 day period from 5 different persons who do not live in the same household;

"opacity" means the degree to which emissions reduce the transmission of light and obscure the view of an object in the background;

"particulate matter" means any finely divided liquid or solid matter other than water droplets;

"particulate residue" means that part or portion of an atmospheric emission which is deposited onto a surface;

"point source" means any point of emission from the Development where pollutants are emitted to the atmosphere by means of a stack;

"QA/QC" means quality assurance/quality control;

"sanitary wastes" means sewage containing human body, toilet, liquid, waterborne culinary, sink or laundry waste;

"sewerage system" means all sewers, appurtenances, pumping stations, treatment works, and all physical properties of the system, but does not include extensions to the collection systems;

"significant" means of important negative consequence as determined by an individual with demonstrated expertise who is qualified to make such judgements;

"stack" means a duct, pipe, chimney, vent, or similar opening through which pollutants are emitted to the atmosphere;

"Standard Methods for the Examination of Water and Wastewater" means the most recent edition of Standard Methods for the Examination of Water and Wastewater published jointly by the American Public Health Association, the American Waterworks Association and the Water Environment Federation;

"uncontaminated wood" means wood which does not contain any preservatives, adhesives, finishes or laminates which could result in the release of pollutants if combusted; and

"Volatile Organic Compound (VOC)" means any organic substance, mixture of organic substances, or the organic components of any mixture of organic and inorganic substances which may evaporate and become airborne during storage, handling or use. Methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides and carbonates, and ammonium carbonate are exempt from this definition as well as other substances so designated by the Director.

GENERAL TERMS AND CONDITIONS – FOR ALL FACILITIES IN THE DEVELOPMENT

This Section of the Licence contains requirements applicable to all facilities in any area of the Development to provide guidance to the Licencee in implementing practices designed to ensure that the environment is maintained in such a manner as to sustain a high quality of life, including social and economic development, recreation and leisure for present and future Manitobans.

1. The Licencee shall implement a high standard of equipment maintenance and good housekeeping and operational practices with respect to the Development, at all times.
2. The Licencee shall reduce the production and dissemination of wastes by initiating and maintaining waste reduction and waste recycling programs.

3. The Licencee shall, upon the request of the Director and in addition to any of the limits, terms or conditions specified in this Licence:
 - a) sample, monitor, analyze and/or investigate specific areas of concern regarding any segment, component or aspect of pollutant storage, containment, treatment, handling, disposal or emission systems, for such pollutants or ambient quality, aquatic toxicity, leachate characteristics and discharge or emission rates, for such duration and at such frequencies as may be specified;
 - b) determine the environmental impact associated with the release of any pollutants from the said Development; or
 - c) provide the Director, within such time as may be specified, with such reports, drawings, specifications, analytical data, descriptions of sampling and analytical procedures being used, bioassay data, flow rate measurements and such other information as may from time to time be requested.
4. The Licencee shall, unless otherwise specified in this Licence:
 - a) carry out all preservations and analyses on liquid samples in accordance with the methods prescribed in the most current edition of Standard Methods for the Examination of Water and Wastewater or in accordance with equivalent preservation and analytical methodologies approved by the Director;
 - b) carry out all sampling of, and preservation and analyses on, soil and air samples in accordance with methodologies approved by the Director;
 - c) ensure that all analytical determinations are undertaken by an accredited laboratory; and
 - d) report the results to the Director within 60 days of the samples being taken.
5. The Licencee shall carry out remedial measures, modifications, or alterations, as deemed necessary by the Director, in respect to matters authorized under this Licence.
6. The Licencee shall provide to the Director, upon request, all information required under this Licence, in writing and in such form and content (including number of copies), as may be specified by the Director.
7. The Licencee shall designate an Environmental Manager within 90 days of the issuance of this Licence, who shall have the responsibility to seek compliance with all the limits, terms and conditions in this Licence, and to assist the Senior Management of Kitchen Craft of Canada Ltd. to manage environmental issues at the Development. The name of the Environmental Manager shall be submitted in writing to the Director within 14 days of appointment.

LIMITS, TERMS AND CONDITIONS

Respecting Baseline Data

8. The Licencee shall submit, to the Director, a completed form as per Attachment 'A' of this Licence within 90 days of the issuance of this Licence. This information shall constitute the baseline data for purposes of this Licence.

Respecting Record Keeping and Reporting

9. The Licencee shall submit, to the Director, an annual report by March 1st of the following year, with the first report due in 2004. The report shall contain the following information:
- a) for any of the materials used as listed in Attachment 'B' of this Licence, a completed copy of the form entitled "Quarterly VOC Mass Balance in Kilograms at the Development of Listed VOCs" as required in Attachment 'C' of this Licence, signed by the Environmental Manager of Kitchen Craft of Canada Ltd.;
 - b) for all VOCs used but not listed in Attachment 'B' of this Licence, a completed copy of the form entitled "Quarterly VOC Mass Balance in Kilograms at the Development of Non-Listed VOCs" as required in Attachment 'D' of this Licence, signed by the Environmental Manager of Kitchen Craft of Canada Ltd.;
 - c) a detailed explanation for any increase in VOC use or release;
 - d) a detailed identification and description of all measures including but not limited to: operational or material modifications; equipment upgrades; process modifications; emission control technologies; etc., that have been implemented in this reporting period to reduce the emissions of VOCs, and an estimated quantification of the emissions reduction from each measure which has been implemented; and
 - e) a detailed identification and description of all proposed measures including: operational or material modifications; equipment upgrades; process modifications; emission control technologies; etc., that are intended to reduce VOC emissions and are to be initiated within the next reporting period.

Respecting Air Emissions – Limits

10. The Licencee shall not emit from the Development:
- a) particulate matter in air emissions that:
 - i) exceeds 0.23 grams per dry standard cubic metre calculated at 25 degrees Celsius and 760 millimetres of mercury, corrected to 12 percent carbon dioxide for processes involving combustion, from any point source of the Development;
 - ii) exhibits a visible plume with an opacity of greater than 5 percent at any point beyond the property line of the Development; or
 - iii) results in the deposition of visible particulate residue at any time beyond the property line of the Development; or
 - b) particulate matter from any point source with an opacity that equals or exceeds:
 - i) 20 percent as the average of any 24 consecutive opacity observations taken at 15 second intervals;
 - ii) 20 percent for more than 16 individual opacity observations within any 1 hour period; or
 - iii) 40 percent for any individual opacity observation.
11. The Licencee shall not cause or permit a noise nuisance to be created as a result of the construction, operation, or alteration of the Development, and shall take such steps as the Director may require to eliminate or mitigate a noise nuisance.

12. The Licencee shall not cause or permit an odour nuisance to be created as a result of the construction, operation, or alteration of the Development, and shall take such steps as the Director may require to eliminate or mitigate an odour nuisance.

Respecting The Operation of Boilers And Heaters

13. The Licencee, shall operate new or upgraded boilers or heaters, in compliance with the appropriate emission limits for nitrogen oxides and carbon monoxide contained in the most recent edition of the Canadian Council of Ministers of the Environment publication entitled "*National Emission Guideline For Commercial/Industrial Boilers And Heaters – Initiative N306*".
14. The Licencee shall only combust uncontaminated wood or natural gas in boilers or heaters at the Development.

Respecting Control of Point Source and Fugitive Emissions

15. The Licencee shall control, capture and direct any airborne emissions containing particulate matter created by cutting, planing, sanding, routing or other processing of wood or wood derived products to an air pollution control device in such a manner that particulate matter is not emitted from the Development in exceedance of limits contained in this Licence.
16. The Licencee shall handle and store all unprocessed wood, processed wood, waste wood and sawdust in such a manner that particulate matter is not emitted from the Development in exceedance of limits contained in this Licence.
17. The Licencee shall control, capture and direct any airborne emissions containing particulate matter created by staining, cleaning, coating or finish coating of wood or wood derived products to an air pollution control device in such a manner that particulate matter is not emitted from the Development in exceedance of limits contained in this Licence.

Respecting Remediative Measures to Reduce VOC Emissions

18. The Licencee shall submit for the Directors approval, within 180 days of the issuance of this Licence, a detailed plan for the management of VOC emissions from the Development addressing:
 - a) measures taken prior to issuance of this Licence with dates of implementation and outcomes; and
 - b) remediative measures to manage the impingement of VOC emissions beyond the property boundaries of the Development including but not limited to the following:
 - i) a reduction in VOC emissions by means of operational or equipment modifications;
 - ii) an appropriate dispersion of emissions by means of alterations to the stack design;
 - iii) the treatment of emissions by an appropriate air pollution control device; and
 - iv) other appropriate approved alternative reduction measure(s).

19. The Licencee, upon written request from the Director, shall initiate remediative measures to reduce the impingement of emissions from the Development associated with the use of materials containing VOC substances, beyond the property boundaries of the Development, if in the opinion of the Director, based on representation to the Director from the community, or other significant forthcoming information, such emissions are resulting in or could result in a negative impact to the community. The remediation shall be implemented to the satisfaction of the Director by such measures as:
- a) a reduction in VOC emissions by means of operational or equipment modifications;
 - b) an appropriate dispersion of emissions by means of alterations to the stack design as approved by the Director;
 - c) the treatment of emissions by an appropriate air pollution control device; or
 - d) other appropriate approved alternative reduction measure(s).

Respecting Air Pollution Control Devices

20. The Licencee shall direct, as required in Clauses 15 and 17 of this Licence, all air streams containing pollutants to a pollution control device which has been designed for and demonstrated to be capable of reducing, altering, eliminating or otherwise treating the pollutants.
21. The Licencee shall submit for the Directors approval, within 90 days of the issuance of this Licence, a standard operating procedural manual and a maintenance schedule for each air emission pollution control device based on the manufacturers specifications and recommendations.
22. The Licencee, pursuant to Clauses 20 and 21 of this Licence, shall not operate any process directing an emission to an air pollution control device at the Development unless:
- a) the operating and maintenance measures and status of the device are in full compliance with the approved procedures and timetables;
 - b) all emissions from the process are directed to the fully operational air pollution control device;
 - c) all discharges of treated emissions from the air pollution control devices are immediately directed to a stack; and
 - d) the emissions do not contain concentrations of pollutants which:
 - i) are in violation of any other applicable legal instrument including an Act, Regulation or by-law; or
 - ii) otherwise create a significant health or environmental impact beyond the boundaries of the Development.
23. The Licencee shall maintain a log book of the most recent 24 month period to record any maintenance or breakdown of any air pollution control device. The log book shall be kept at the Development and shall be available upon request for inspection by an Environment Officer. The log book shall record, at minimum, the following information:
- a) identification of the air pollution control device and the process(s) it serves;
 - b) time/date of log entry; and
 - c) nature of maintenance/event.

24. The Licencee shall handle, store and dispose of all sludges and solid wastes collected by the air pollution control equipment in a manner suitable to their characterization as type of waste or dangerous good.

Respecting Air Emissions – Sampling, Analysis, Reporting

25. The Licencee, upon written request from the Director, shall provide a stack or stacks at any area of the Development including all necessary sampling facilities for the sampling of air emissions at the Development. The stack or stacks shall be provided:
- a) at a location(s) and within a time frame satisfactory to the Director; and
 - b) to the specifications and in accordance with the most recent version of Manitoba Conservation Guideline, *Guideline for Stack Sampling Facilities*, unless otherwise approved by the Director.
26. The Licencee, upon a written request from the Director, shall submit a detailed plan for any area of the Development which is acceptable to and approved by the Director, for the sampling and analysis of potential air pollutants, released as stationary point and fugitive emissions, including any compounds determined by the Director. The plan shall identify the rationale for the sampling, the ways and means by which the sampling program will be implemented including any special measures or methods which would be necessitated by influencing factors such as unfavourable weather conditions, the need for large or additional sample volumes, the need for multiple sampling runs, the methods used for the sampling and the analysis for each compound, the detection level to be attained, a comprehensive QA/QC program, and other items as may be identified by the Director.
27. The Licencee shall perform all stack sampling in accordance with the most recent version of Manitoba Conservation Report No. 96-07, *Interim Stack Sampling Performance Protocol*, unless otherwise approved by the Director.
28. The Licencee shall arrange the scheduling of the sampling program, referred to in Clause 26 of this Licence, such that a representative of Manitoba Conservation is available to monitor and audit the implementation of the sampling program.
29. The Licencee, within a timeframe to be determined by the Director, shall complete the sampling of emissions according to the approved plan submitted pursuant to Clause 26 of this Licence.
30. The Licencee, within 60 days of the receipt of the analytical results of the sampling plan pursuant to Clause 26 of this Licence, shall submit a report for the approval of the Director containing at minimum:
- a) the raw data collected;
 - b) a discussion of the sampling and analytical portions of the program including any anomalies of sampling and analysis; and
 - c) a discussion of the significance of the data gathered with specific attention to:
 - i) the significance for potential acute and chronic impacts to health or environment from exposure to concentrations of the compounds detected;
 - ii) the need for risk assessment of the impact of emissions;

- iii) the need for the establishment of ambient air monitoring stations;
 - iv) the need for dispersion modeling of emissions;
 - v) results and conclusions of the QA/QC program; and
 - vi) other issues as may be determined by the Director.
31. The Licencee, upon the written request of and in a timeframe stipulated by the Director, shall comply with any air emission or ambient air quality criteria specified by the Director for any pollutant of concern to the Director which has been identified pursuant to Clauses 3, 10, 13 or 26 of this Licence.

Respecting Ambient Air Quality Monitoring

32. The Licencee shall submit, upon the written request and for the approval of the Director, a program for:
- a) the sampling, analysis and reporting of levels of pollutants, as determined by the Director, at a selected location(s) beyond the property boundaries of the Development; and
 - b) the location, installation and operation of a meteorological monitoring station.
33. The Licencee shall implement the approved program submitted pursuant to Clause 32 of this Licence within a timeframe stipulated by the Director.

Respecting Chemical Storage and Spill Containment

34. The Licencee shall comply with all the applicable requirements of:
- a) Manitoba Regulation 188/2001, or any future amendment thereof, respecting the *Storage and Handling of Petroleum Products and Allied Products*;
 - b) The Dangerous Goods Handling and Transportation Act, and regulations issued thereunder, respecting the handling, transport, storage and disposal of any dangerous goods brought onto or generated at the Development; and
 - c) Manitoba Fire Code, Regulation 163/98 of The Fire Prevention And Emergency Response Act (C.C.S.M. c. F80).
35. The Licencee shall provide containment for all vessels containing chemicals and in each area of the development where chemicals are stored, loaded, transferred, used or otherwise handled by grading, surfacing, diking, curbing or by other means acceptable to the Director, such that any product leakage or spillage and any contaminated liquid generated is contained within the Development and contamination of groundwater is prevented.
36. The Licencee shall provide sufficient storage capacity within any containment area of the development required by Clause 35 of this Licence, for a liquid volume equal to:
- a) 110% of the volume of the largest storage tank located therein; and
 - b) the effective displacement volume of all other tanks and structures located therein;
- unless otherwise approved in writing by the Director.
37. The Licencee shall maintain the liquid storage volume capacity, as required by Clause 36 of this Licence, by the timely removal and disposal, in a manner approved by the Director, of all accumulated fluids.

Respecting Solid Waste

38. The Licencee shall dispose of all solid waste generated from any activity at the Development, which is not recycled, only to a waste disposal ground operating under the authority of a permit issued pursuant to Manitoba Regulation 150/91 or any future amendment thereof, or a Licence issued pursuant to The Environment Act.

Respecting Sanitary Waste Disposal

39. The Licencee shall discharge sanitary wastes only to a sewerage system.

Respecting Emergency Response Planning

40. The Licencee, within 90 days of the issuance of this Licence, or other time frame approved by the Director, shall submit for approval of the Director, a contingency plan in accordance with the Manitoba Industrial Accidents Council (MIAC) *Industrial Emergency Response Planning Guide*, outlining procedures to be used in the event of a leak, spill, fire, or other hazardous condition at the Development.

Respecting Financial Assurance

41. The Licencee, within 90 days of the issuance of this Licence, shall post with the Manitoba Department of Conservation in the amount of \$100,000 Cdn:
- a) a permit bond issued by a surety company licenced to do business in the Province of Manitoba;
 - b) an irrevocable letter of credit; or
 - c) another acceptable security satisfactory to the Director.

This permit bond, irrevocable letter of credit, or other security and renewals thereof shall remain in place for the duration of the operation and decommissioning of the facility. The Director may order forfeiture of the permit bond, irrevocable letter of credit, or other security, either in whole or in part, by giving written notice to that effect to the Licencee, upon the Director being satisfied that the Licencee is in breach of any specification, limit, term or condition of this Licence, or for reimbursement of any costs or expenses incurred by the Province of Manitoba in rectifying environmental damage caused or contributed to by the operation of the facility.

42. The Licencee shall, within 90 days of the issuance of this Licence, provide to the Director confirmation of Environmental Impairment Liability insurance providing coverage subject to a minimum limit of \$1,000,000 Cdn per occurrence or claim, including coverage for gradual, and sudden and accidental pollution. Coverage to include on-site and off-site clean up costs, and be placed with insurers satisfactory to the Province of Manitoba. The Province of Manitoba is to be added as an Additional Insured on the policy. The policy shall contain a clause stating that the Insurer will give Manitoba 60 days prior written notice in case of a reduction in coverage or policy cancellation.

REVIEW AND REVOCATION

- A. If, in the opinion of the Director, the Licencee has exceeded or is exceeding or has or is failing to meet the specifications, limits, terms, or conditions set out in this Licence, the Director may, temporarily or permanently, revoke this Licence.
- B. If, in the opinion of the Director, new evidence warrants a change in the specifications, limits, terms or conditions of this Licence, the Director may require the filing of a new Proposal pursuant to Section 10 of The Environment Act.



**Larry Strachan, P. Eng.
Director
Environment Act**

Client File No.: 4659.00

Attachment 'A' - To Environment Act Licence No. 2625 R

Baseline Data - Annual Average VOC Mass Balance In Kilograms - 2000 to 2002

Year	VOCs Used	VOCs Released
2000		
2001		
2002		
Average		

To the best of my knowledge, the above information is true and accurate.

Attachment 'B' – To Environment Act Licence No. 2625 R

VOC Listing – Kitchen Craft of Canada

Common Name	CAS No.	Carcinogen ² (Y/N)
1,2,4-trimethyl benzene	95-63-6	- ³
1,2,5-trimethylbenzene	108-67-8	-
1,6-hexanediol diisocyanate	822-06-0	N ⁴
1-methoxy propanol	107-98-2	N
1-methoxy-2-propyl acetate	108-65-8	-
2-butoxyethanol	111-76-2	Y ⁵
acetone	67-64-1	N
aliphatic polyisocyanate	3779-63-3	-
bis(2-ethylhexyl) phthalate	117-81-7	N
butyl benzyl phthalate	85-68-7	N
copper phthalocyanine	147-14-8	-
ethyl 3-ethoxy propionate	763-69-9	-
ethyl acetate	141-78-6	N
ethyl alcohol	67-17-5	-
ethylbenzene	100-41-4	N
ethylene glycol butyl ether acetate	112-07-2	-
formaldehyde	50-00-0	Y
isobutyl acetate	110-19-0	-
isobutyl alcohol	78-83-1	N
isobutyl isobutyrate	97-85-8	-
isopropyl alcohol	67-63-0	-
methanol	67-56-1	N
methyl ethyl ketone (MEK)	78-93-3	N
methyl n-amyl ketone	110-43-0	-
n-butyl acetate	123-86-4	-
n-butyl alcohol	71-36-3	N
propylene glycol butyl ether	5131-66-8	-
p-toluene sulfonic acid	104-15-4	-
toluene	108-88-3	N
xylene	1330-20-7	N

Notes:

1. The above VOC listing is based on information provided in the EIA and is to be reviewed and updated on an as needed basis by the Licencee. Any additions are to be brought to the attention of the Director.
2. Carcinogenicity based on United States Environment Protection Agency Integrated Risk Information System (IRIS) database. Possible, probable and known carcinogens are to be identified.
3. Not identified in IRIS database shown as '-'.³
4. Not assessed in IRIS database for carcinogenicity related to inhalation, or weight of evidence not conclusive shown as 'N'.⁴
5. An identified possible, probable or known carcinogen related to inhalation shown as 'Y'.⁵

Attachment 'C' - To Environment Act Licence No. 2625 R

Quarterly VOC Mass Balance In Kilograms at the Development of Listed VOCs^{1,2}

VOC	CAS No.		January to March	April to June	July to September	October to December	Total
		Purchased					
		Released					
		Purchased					
		Released					
		Purchased					
		Released					
		Purchased					
		Released					
		Purchased					
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		Purchased					
		Released					
		Purchased					
		Released					
		Purchased					
		Released					
		Purchased					
		Released					
		Total					
		Purchased					
		Released					

- Notes:**
- 1 Record only those VOC's whose usage was greater than 100 kg/month.
 - 2 Record usage of any VOC classified as a probable or known carcinogen.

To the best of my knowledge, the above information is true and accurate.

Attachment 'D' - To Environment Act Licence No. 2625 R

Quarterly VOC Mass Balance In Kilograms at the Development of Non-Listed VOCs^{1,2}

VOC	CAS No.		January to March	April to June	July to September	October to December	Total
Other VOCs		Purchased					
		Released					

Notes:

- 1 Record only those VOC's whose usage was greater than 100 kg/month.
- 2 Record usage of any VOC classified as a probable or known carcinogen.

To the best of my knowledge, the above information is true and accurate.
