Facil	lity	Int	orma	tion

Company Name	Terra International (Canada) Inc.	
Facility Name	CF Industries Courtright Nitrogen Complex	
Facility Physical Address	161 Bickford Line, Courtright, ON, Canada, N0N 1H0	
Facility Mailing Address	Same as physical address	
Spatial Coordinates of Facility	381104 Easting; 4735453 Northing	
Number of Employees	210	
NPRI ID	2233	
2 Digit NAICS Code	31-33	
4 Digit NAICS Code	3253	
6 Digit NAICS Code	325313	

#### Parent Company Information

Parent Company Name	CF Industries Holdings Inc.
Address	Suite 400 - 4 Parkway North, Deerfield, IL, USA, 60015-2590
Percent Ownership (if available)	100.00%

#### **Facility Contact**

Public Contact	Joe Lasowski	
Position	Environmental Engineer	
Address	161 Bickford Line, Courtright, ON, Canada, N0N 1H0	
email	JLasowski@cfindustries.com	
Phone Fax	519-867-2739 x1605	
Fax	519-867-3173	

#### Date of Summary

Reporting Year	2017
Summary Date	June 1, 2018

#### **Toxics Substances Reported**

Copper, Cobalt, Sulphuric Acid, Zinc, Nickel, Ammonia, Nitrate Ion, Nitric Acid, PM10, PM2.5, CO, NOx, hexane, propane, butane and pentane

Toxics substances reported in 2016RY that did not meet the reporting threshold in 2017RY:

Formaldehyde, Methanol

#### Copy of Certification:

As of June 1, 2018, I certify that I have read the report on the toxic substance reduction plan(s) for the toxics listed above and am familiar with their contents and to my knowledge the information contained in the report(s) is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

The original version of this report is signed off by:

Highest Ranking Employee: Amanda Pascavage

Title: Plant Manager

Signature: Amanda Pascavage

Substance Name	COPPER (AND ITS COMPOUNDS)
CAS#	No single CAS number applies to this substance
Report Date:	June 1, 2018
Plan Date:	15-Dec-12
	While CF Industries Courtright Nitrogen Complex does not intend to reduce

Toxics Substance Accounting and Comparison

Delta %	Delta	2017	2016	Pathways
W. 100 100 100 100 100 100 100 100 100 10		tonnes	tonnes	Units reported
-12%	>0 to -1	>0 to 1	>0 to 1	U - Enters the Process (Raw Materials)
NA	#N/A	0	0	C - Created
-10%	>0 to -1	>0 to 1	>0 to 1	P - In a product that leaves the process
	>0 to -1		>0 to 1  Decrease in natural	P - In a product that leaves the process  Summary of reasons for changes between current year and previous year.

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

#### **CF Industries Courtright Nitrogen Complex Toxics Reduction Public Summary Report** Substance Information and Plan Objective Substance Name ZINC (AND ITS COMPOUNDS) CAS# No single CAS number applies to this substance Report Date: June 1, 2018 Plan Date: 15-Dec-12 While CF Industries Courtright Nitrogen Complex does not intend to reduce the use of zinc, the plan was developed with the following objectives: we will continue to operate in full compliance with all applicable Plan Objectives and Targets environmental regulations; and we will continue to manage and prevent releases of zinc through current and future pollution prevention and best management practices. Toxics Substance Accounting and Comparison Pathways Units reported 2016 2017 Delta Delta % tonnes tonnes U - Enters the Process (Raw Materials) C - Created >0 to 1 >0 to 1 >0 to -1 -12% 0 0 #N/A NA P - In a product that leaves the process >0 to 1 >0 to 1 >0 to -1 -10% Summary of reasons for changes between Decrease in natural gas usage current year and previous year. On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en Progress in Implementing Plan Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions Not Applicable achieved as a result of the steps taken. Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the Not Applicable steps and toxics reductions achieved as a result of those actions. Summary of differences between steps taken and those set out Not Applicable in the plan. Description of amendments to the plan.

Not Applicable

Substance	Information and Plan Objective	
	Substance Name	NIC

Substance Name	NICKEL (AND ITS COMPOUNDS EXCEPT NICKEL CARBONYL)		
CAS#	No single CAS number applies to this substance		
Report Date:	June 1, 2018		
Plan Date:	1-Dec-14		
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the use of nickel, the plan was developed with the following objectives:  we will continue to operate in full compliance with all applicable environmental regulations; and  we will continue to manage and prevent releases of nickel through current and future pollution prevention and best management practices.		

Toxics Substance Accounting and Comparison

Pathways	2016	2017	Delta	Delta %
Units reported	tonnes	tonnes		Cart April Specia
U - Enters the Process (Raw Materials)	>0 to 1	>0 to 1	>0 to -1	-12%
C - Created	0	0	#N/A	NA
P - In a product that leaves the process	>0 to 1	>0 to 1	>0 to -1	-10%
Summary of reasons for changes between current year and previous year.	Decrease in natura	l gas usage		

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

Substance Informa	ation and	Plan	Objective
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Substance Name	SULPHURIC ACID
CAS#	7664-93-9
Report Date:	June 1, 2018
Plan Date:	15-Dec-12

Toxics Substance Accounting and Comparison

Pathways	2016	2017	Delta	Delta %
Units reported	tonnes	tonnes		
U - Enters the Process (Raw Materials)	>100 to 1000	>100 to 1000	>10 to 100	21%
C - Created	0	0	#N/A	NA
P - In a product that leaves the process	0	0	#N/A	NA

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

Substance	Information	and Plan	Objective

Substance Name	PM10	
CAS#	No single CAS number applies to this substance	
Report Date:	June 1, 2018	
Plan Date:	15-Dec-13	
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the creation of particulate matter, the plan was developed with the following objectives:  we will continue to operate in full compliance with all applicable environmental regulations; and we will continue to manage and prevent releases of particulate matter through current and future pollution prevention and best management practices.	

#### Toxics Substance Accounting and Comparison

Pathways	2016	2017	Delta	Delta %
Units reported	tonnes	tonnes		
U - Enters the Process (Raw Materials)	0	0	#N/A	NA
C - Created	>10 to 100	>1 to 10	> -1 to -10	-50%
P - In a product that leaves the process	0	0	#N/A	NA
Summary of reasons for changes between current year and previous year.	Decrease in produc	tion		

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

#### **CF Industries Courtright Nitrogen Complex Toxics Reduction Public Summary Report** Substance Information and Plan Objective Substance Name CAS # PM2.5 No single CAS number applies to this substance Report Date: June 1, 2018 Plan Date: 15-Dec-13 While CF Industries Courtright Nitrogen Complex does not intend to reduce the creation of particulate matter, the plan was developed with the following objectives: we will continue to operate in full compliance with all applicable Plan Objectives and Targets environmental regulations; and we will continue to manage and prevent releases of particulate matter through current and future pollution prevention and best management practices. Toxics Substance Accounting and Comparison Pathways 2016 2017 Delta Delta % Units reported tonnes tonnes U - Enters the Process (Raw Materials) 0 0 #N/A C - Created >10 to 100 >1 to 10 > -1 to -10 -50% P - In a product that leaves the process 0 0 #N/A NA Summary of reasons for changes between Decrease in production current year and previous year. On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en Progress in Implementing Plan Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions Not Applicable achieved as a result of the steps taken. Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the Not Applicable steps and toxics reductions achieved as a result of those actions. Summary of differences between steps taken and those set out Not Applicable in the plan. Description of amendments to the plan.

Not Applicable

Substance	Information	and Plan	Objective

Substance Name	CO
CAS#	630-08-0
Report Date:	June 1, 2018
Plan Date:	15-Dec-13
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the creation of carbon monoxide, the plan was developed with the following objectives:  • we will continue to operate in full compliance with all applicable environmental regulations; and  • we will continue to manage and prevent releases of carbon monoxide through current and future pollution prevention and best management practices.

Toxics Substance Accounting and Comparison

Pathways	2016	2017	Delta	Delta %
Units reported	tonnes	tonnes		
U - Enters the Process (Raw Materials)	0	0	#N/A	NA
C - Created	>100 to 1000	>100 to 1000	> -10 to -100	-15%
P - In a product that leaves the process	0	0	#N/A	NA
Summary of reasons for changes between current year and previous year.	Decrease in produc	etion		

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

CF Industries Courtright Nitrogen Complex
<b>Toxics Reduction Public Summary Report</b>

Substance In	formation and	Plan	Objective
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Substance Name	NOx
CAS#	11104-93-1
Report Date:	June 1, 2018
Plan Date:	15-Dec-13
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the creation of nitrogen oxides, the plan was developed with the following objectives:  we will continue to operate in full compliance with all applicable environmental regulations; and we will continue to manage and prevent releases of nitrogen oxides through current and future pollution prevention and best management practices.

Toxics Substance Accounting and Comparison

Pathways	2016	2017	Delta	Delta %
Units reported	tonnes	tonnes		
U - Enters the Process (Raw Materials)	0	0	#N/A	NA
C - Created	>100 to 1000	>100 to 1000	> -10 to -100	-12%
P - In a product that leaves the process	0	0	#N/A	NA
Summary of reasons for changes between current year and previous year.	Decrease in produc	tion		

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

Substance Information and Plan C	biective
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Substance Name	n-hexane
CAS#	110-54-3
Report Date:	June 1, 2018
Plan Date:	15-Dec-13
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the creation of nhexane, the plan was developed with the following objectives:  • we will continue to operate in full compliance with all applicable environmental regulations; and  • we will continue to manage and prevent releases of n-hexane through current and future pollution prevention and best management practices.

Toxics Substance Accounting and Comparison

	2017	Delta	Delta %
tonnes	tonnes		
0	0	#N/A	NA
>1 to 10	>1 to 10	>0 to -1	-17%
0	0	#N/A	NA
	0	0 0	0 0 #N/A >1 to 10 >1 to 10 >0 to -1

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

Substance	Information	and	Plan	Ob	iective

Substance Name	propane
CAS#	74-98-6
Report Date:	June 1, 2018
Plan Date:	15-Dec-13
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the creation of propane, the plan was developed with the following objectives:  • we will continue to operate in full compliance with all applicable environmental regulations; and  • we will continue to manage and prevent releases of propane through current and future pollution prevention and best management practices.

Toxics Substance Accounting and Comparison

tonnes	tonnes		
0			
0 1	0	#N/A	NA
>1 to 10	>1 to 10	>0 to -1	-17%
0	0	#N/A	NA
	0	>1 to 10	0 0 #N/A

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

Substance	Information	and Plan	Objective

Substance Name	BUTANE AND ALL ITS ISOMERS
CAS#	106-97-8
Report Date:	June 1, 2018
Plan Date:	15-Dec-13
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the creation of butane, the plan was developed with the following objectives:  • we will continue to operate in full compliance with all applicable environmental regulations; and  • we will continue to manage and prevent releases of butane through current and future pollution prevention and best management practices.

Toxics Substance Accounting and Comparison

Pathways	2016	2017	Delta	Delta %
Units reported	tonnes	tonnes		
U - Enters the Process (Raw Materials)	0	0	#N/A	NA
C - Created	>1 to 10	>1 to 10	>0 to -1	-17%
P - In a product that leaves the process	0	0	#N/A	NA
Summary of reasons for changes between current year and previous year.	Decrease in natura	l gas usage		

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

Substance	Information	and Plan	Objective
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Substance Name	Pentane and its isomers
CAS#	109-66-0
Report Date:	June 1, 2018
Plan Date:	15-Dec-13
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the creation of pentane, the plan was developed with the following objectives:  • we will continue to operate in full compliance with all applicable environmental regulations; and  • we will continue to manage and prevent releases of pentane through current and future pollution prevention and best management practices.

Toxics Substance Accounting and Comparison

Pathways	2016	2017	Delta	Delta %
Units reported	tonnes	tonnes		
U - Enters the Process (Raw Materials)	0	0	#N/A	NA
C - Created	>1 to 10	>1 to 10	>0 to -1	-17%
P - In a product that leaves the process	0	0	#N/A	NA
Summary of reasons for changes between current year and previous year.	Decrease in natural	l gas usage		

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

Substance I	nformation	and Plan	Objective

Substance Name	Ammonia
CAS#	7664-41-7
Report Date:	June 1, 2018
Plan Date:	15-Dec-13
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the use or creation of ammonia, the plan was developed with the following objectives:  • we will continue to operate in full compliance with all applicable environmental regulations; and  • we will continue to manage and prevent releases of ammonia through current and future pollution prevention and best management practices.

Toxics Substance Accounting and Comparison

Pathways	2016	2017	Delta	Delta %
Units reported	tonnes	tonnes		
U - Enters the Process (Raw Materials)	>0 to 1	>1 to 10	>1 to 10	331%
	>100,000 to	>100,000 to		
C - Created	1,000,000	1,000,000	>-10,000 to -100,000	-11%
	>100,000 to	>100,000 to		
P - In a product that leaves the process	1,000,000	1,000,000	> -1000 to -10,000	-2%

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

Substance	Inf	formation	and I	Plan	Ob	iective

Substance Name	Nitrate Ion
CAS#	No single CAS number applies to this substance
Report Date:	June 1, 2018
Plan Date:	15-Dec-13
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the use or creation of nitrate ion, the plan was developed with the following objectives:  we will continue to operate in full compliance with all applicable environmental regulations; and we will continue to manage and prevent releases of nitrate ion through current and future pollution prevention and best management practices.

### Toxics Substance Accounting and Comparison

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6%
9%
9%
s

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

Substance Information and	Plan	Objective	
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Substance Name	Nitric Acid
CAS#	7697-37-2
Report Date:	June 1, 2018
Plan Date:	15-Dec-13
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the creation of nitric acid, the plan was developed with the following objectives:  we will continue to operate in full compliance with all applicable environmental regulations; and we will continue to manage and prevent releases of nitric acid through current and future pollution prevention and best management practices.

Toxics Substance Accounting and Comparison

Pathways	2016	2017	Delta	Delta %
Units reported	tonnes	tonnes		
U - Enters the Process (Raw Materials)	0	0	#N/A	NA
	>100,000 to			" " - 11
C - Created	1,000,000	>10,000 to 100,000	> -1000 to -10,000	-7%
P - In a product that leaves the process	>1000 to 10,000	>10,000 to 100,000	>1000 to 10,000	17%
Summary of reasons for changes between current year and previous year.			ncrease in nitric acid s	shipped

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable

Substance	Information	and Dlan	Ohiontino
oubstance	momation	allu riali	Objective

Substance Name	COBALT (AND ITS COMPOUNDS)
CAS#	1332-21-4
Report Date:	June 1, 2018
Plan Date:	27-Nov-17
Plan Objectives and Targets	While CF Industries Courtright Nitrogen Complex does not intend to reduce the creation of cobalt, the plan was developed with the following objectives:  we will continue to operate in full compliance with all applicable environmental regulations; and  we will continue to manage and prevent releases of nitric acid through current and future pollution prevention and best management practices.

Toxics Substance Accounting and Comparison

kg >0 to 1	kg		Delta %
>0 to 1			
-U 10 1	>0 to 1	>0 to -1	-12%
0	0	#N/A	NA
>0 to 1	>0 to 1	>0 to -1	-10%
		0 0 >0 to 1 >0 to 1	>0 to 1

On-site releases from the facility to air, water and land, as well as on and off-site disposal and off-site recycling can be viewed by searching for this facility at http://www.ec.gc.ca/inrp-npri/default.asp?lang=en

Summary of steps taken during the previous calendar year to implement the plan and a summary of the toxics reductions achieved as a result of the steps taken.	Not Applicable
Summary of additional actions taken during the previous calendar year that impacted the toxic, and a summary of the steps and toxics reductions achieved as a result of those actions.	Not Applicable
Summary of differences between steps taken and those set out in the plan.	Not Applicable
Description of amendments to the plan.	Not Applicable