

**SONOCO CANADA CORPORATION**  
**TRENT VALLEY MILL**  
5 BERNARD LONG ROAD, TRENTON, ONTARIO K8V 5P6

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

REPORT PREPARED BY:  
*O2E Inc.*

REPORT PREPARED FOR:  
*SONOCO CANADA CORPORATION*

AUGUST 21, 2014

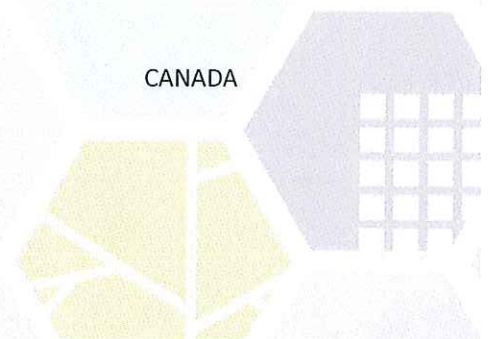
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CANADA



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## 1. PLAN SUMMARY – Carbon Monoxide (CO)

Name and CASRN of Substance	Carbon Monoxide	630-08-2
Substances for which other plans have been prepared	Oxides of Nitrogen (NO <sub>x</sub> )	11104-93-1

### 1.1 Basic Facility Information

Basic facility information has been included in Section 3 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, greenhouse gases 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 Carbon Monoxide 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 Carbon Monoxide 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**

Carbon Monoxide is 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 Carbon Monoxide 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 and the United States Environmental Protection Agency in AP-42.

#### **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 Carbon Monoxide, prepared on behalf of Sonoco, dated August 21, 2014.

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

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



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

Name and CASRN of Substance	Oxides of Nitrogen (NO <sub>x</sub> )	11104-93-1
Substances for which other plans have been prepared	Carbon Monoxide (CO)	630-08-2

### 2.1 Basic Facility Information

Basic facility information has been included in Section 3 of this document.

### 2.2 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, greenhouse gases 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.

### 2.3 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.

## **2.4 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 and the United States Environmental Protection Agency in AP-42.

## **2.5 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.

## **2.6 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 August 21, 2014.

## **2.7 Copy of Plan Confirmation**

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

### 3. BASIC FACILITY INFORMATION

Facility Identification and Site Address		
Company Name	Sonoco Canada Corporation	
Facility Name	Sonoco Trent Valley Mill	
Facility Address	Physical Address:	Mailing Address
	5 Bernard Long Road Trenton ON K8V 5P6	5 Bernard Long Road Trenton ON K8V 5P6
Spatial Coordinates (UTM)	293322 (Easting)	4892170 (Northing)
Datum	WGS84	
Number of Employees	95 (Full time equivalents)	
NPRI ID	7684	
ON MOE ID	-	
Parent Company Information		
Parent Company Name & Address	Sonoco Products Company 1 North Second Street Hartsville, SC 29550	
Percent Ownership	100%	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 Manufacturing	
4 Digit NAICS Code	3221 Pulp, Paper and Paperboard Mills	
6 Digit NAICS Code	322130 Paperboard Mills	
Company Contact Information		
Facility Public Contact	Jason Giffen Plant Manager	Contact Address
	jason.giffen@sonoco.com	5 Bernard Long Road
	Phone: 613-392-1231	Trenton ON
	Fax: 613-392-1231	K8V 5P6

### **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 September 25, 2014, I, Jason Giffen, 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:

Carbon Monoxide  
Oxides of Nitrogen (as NO<sub>x</sub>)



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Jason Giffen  
Plant Manager  
Sonoco Trenton



## Confirmation by Licensed Planner

As of September 25<sup>th</sup>, 2014, I, Tim Logan certify that I am familiar with the processes at Sonoco's Trenton 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 August 21<sup>st</sup>, 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:

Carbon Monoxide  
Oxides of Nitrogen (as NO<sub>x</sub>)



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

# Plan Summary Preview

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## Company Details

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Company Legal Name

Sonoco Canada Corporation

Company Address

33 Park Avenue East, Brantford (Ontario)

## Report Details

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Facility Name

Sonoco - Trent Valley Mill

Facility Address

5 Bernard Long Road, Trenton (Ontario)

Update Comments

## Activities

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## Contacts

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Select the Facility Contacts

### Facility Contacts

---

Please assign the appropriate contact under each category below.

Public Contact: \*

Jason Giffen

Highest Ranking Employee

Jason Giffen

Person responsible for Toxic Substance Reduction Plan preparation

Tim Logan

## Organization Validation

---

## Company and Parent Company Information

---

### Company Details

---

Company Legal Name: \* Sonoco Canada Corporation

Company Trade Name: \*

Sonoco Canada Corporation

Business Number: \*

104930748

### Mailing Address

---

Delivery Mode

Post Office Box

PO Box

1208

Rural Route Number

Address Line 1

33 Park Avenue East

City \*

Brantford

Province/Territory \*\*

Ontario

Postal Code: \*\*

N3T5T5

### Physical Address

---

Address Line 1

33 Park Avenue East

City

Brantford

Province/Territory

Ontario

Postal Code

N3T 5T5

Additional Information

Land Survey Description

National Topographical Description

### Parent Companies

---

#### Sonoco Products Company

---

Company Legal Name: \*

Sonoco Products Company

Percentage owned: \*

100.00

Business Number: \*

104930748

## Mailing Address

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Delivery Mode	<input type="text" value="Suburban Services"/>
PO Box	<input type="text"/>
Rural Route Number	<input type="text"/>
Address Line 1	<input type="text" value="1 Second Street North"/>
City *	<input type="text" value="Hartsville"/>
Province/Territory **	<input type="text" value="South Carolina"/>
Postal Code: **	<input type="text" value="29550"/>

## Physical Address

---

Address Line 1	<input type="text"/>
City	<input type="text"/>
Province/Territory	<input type="text"/>
Postal Code	<input type="text"/>
Additional Information	<input type="text"/>
Land Survey Description	<input type="text"/>
National Topographical Description	<input type="text"/>

## Facility Validation

---

The information in this section was copied from the Single Window Information Manager (SWIM) at the time the plan summary was created. Please verify the information and update it where required. Please note that any changes made here will only be reflected in this plan summary. To ensure updates reflected in future reports, please ensure the information is updated in SWIM. After making updates in SWIM, return here and click the "Refresh" button to trigger a reload of the SWIM information. Please note all previously entered data will be modified.

## Facility Information

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Facility Name: *	<input type="text" value="Sonoco - Trent Valley Mill"/>
NAICS Code: *	<input type="text" value="322130"/>



NPRI Id: \*

ON Reg 127/01 Id

### Facility Mailing Address

---

Delivery Mode

PO Box

Rural Route Number

Address Line 1

City \*

Province/Territory \*\*

Postal Code: \*\*

### Physical Address

---

Address Line 1

City

Province/Territory

Postal Code

Additional Information

Land Survey Description

National Topographical Description

### Geographical Address

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Latitude \*\*

Longitude \*\*

UTM Zone \*\*

UTM Easting \*\*

UTM Northing \*\*

4892170

## Contact Validation

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The information in this section was copied from the Single Window Information Manager (SWIM) at the time the plan summary was created. Please verify the information and update it where required. Please note that any changes made here will only be reflected in this plan summary. To ensure updates reflected in future reports, please ensure the information is updated in SWIM. After making updates in SWIM, return here and click the "Refresh" button to trigger a reload of the SWIM information. Please note all previously entered data will be modified.

## Contacts

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### Public Contact

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First Name: \*

Jason

Last Name: \*

Giffen

Position: \*

Plant Manager

Telephone: \*

6133921231

Ext

247

Fax

Email: \*

jason.giffen@sonoco.com

### Mailing Address

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Delivery Mode

General Delivery

PO Box

Rural Route Number

Address Line 1

5 Bernard Long Road

City \*

Trenton

Province/Territory \*\*

Ontario

Postal Code: \*\*

K8V 5P6

### Highest Ranking Employee

---

First Name: \*

Jason  
Last Name: \* Giffen  
Position: \* Plant Manager  
Telephone: \* 6133921231  
Ext 247  
Fax  
Email: \* jason.giffen@sonoco.com

### Mailing Address

---

Delivery Mode General Delivery  
PO Box  
Rural Route Number  
Address Line 1 5 Bernard Long Road  
City \* Trenton  
Province/Territory \*\* Ontario  
Postal Code: \*\* K8V 5P6

### Person responsible for the Toxic Substance Reduction Plan preparation

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Tim  
First Name: \*  
Last Name: \* Logan  
Position: \* Consultant  
Telephone: \* 5196332400  
Ext  
Fax 5196332700  
Email: \* t.logan@o2e.ca

## Mailing Address

Delivery Mode	General Delivery
PO Box	
Rural Route Number	
Address Line 1	636 - 1673 Richmond Street
City *	London
Province/Territory **	Ontario
Postal Code: **	N6G2N3

## Employees

### Employees

Number of Full-time Employees: \*

95

## Substances

11104-93-1, Nitrogen oxides (expressed as NO2)

11104-93-1, Nitrogen oxides (expressed as NO2)

## Substances Section Data

### Statement of Intent

Are the following included in the Facility's TRA Plan?

### Use

Is there a statement that the owner or operator of the facility intends to reduce the use of the toxic substance at the facility?: \*

No

If 'yes', exact statement of the intent that is included in the facility's TRA Plan to reduce the use of the toxic substance at the facility: \*\*

If 'no', reason in the facility's TRA Plan for no intent to reduce the use of the toxic substance at the facility: \*\*

The facility does not use the substance.



## Creation

Is there a statement that the owner or operator of the facility intends to reduce the creation of the toxic substance at the facility?: \*

No

If 'yes', exact statement of the intent that is included in the facility's TRA Plan to reduce the creation of the toxic substance at the facility: \*\*

If 'no', reason in the facility's TRA Plan for no intent to reduce the creation of the toxic substance at the facility: \*\*

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, greenhouse gases 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.

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 NOx 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.

## Objectives, Targets and Description

### Objectives

Objectives in plan: \*

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 NOx 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 NOx 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.

### Use Targets

What is the targeted reduction in use of the toxic substance at the facility? \*

No quantity target

Quantity

Unit



or

What is the targeted timeframe for this reduction? \*

No timeline target

years

or

Description of targets

### Creation Targets

What is the targeted reduction in creation of the toxic substance at the facility? \*

No quantity target

Quantity

Unit

or

What is the targeted timeframe for this reduction? \*

No timeline target

years

or

Description of Target

### Reasons for Use

Why is the toxic substance used at the facility?: \*

This substance is not used at the facility

Summarize why the toxic substance is used at the facility: \*\*

### Reasons for Creation

Why is the toxic substance created at the facility?: \*

As a by-product

Summarize why the toxic substance is created at the facility: \*\*



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 NOx 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 and the United States Environmental Protection Agency in AP-42.

## Toxic Reduction Options for Implementation

### Description of the toxic reduction option(s) to be implemented

Is there a statement that no option will be implemented?: \*

Yes

If you answered "No" to this question, please add the option(s) under the appropriate Toxic Substance Reduction Categories (e.g. Materials or feedstock substitution, Product design or reformulation, etc.). If you answered "Yes" please provide an explanation below why your facility is not implementing an option. Explanation of the reasons why no option will 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.

Materials or feedstock substitution

Product design or reformulation

Equipment or process modifications

Spill or leak prevention

On-site reuse, recycling or recovery

Improved inventory management or purchasing techniques

Good operator practice or training

Rationale for why the listed options were chosen for implementation

General description of any actions undertaken by the owner and operator of the facility to reduce the use and creation of the toxic substance at the facility that are outside of the plan

License Number of the toxic substance reduction planner who made recommendations in the toxic substance reduction plan for this substance (format TSRPXXXX): \*

TSRP0003

License Number of the toxic substance reduction planner who has certified the toxic substance reduction plan for this substance (format TSRPXXXX): \*

TSRP0003

What version of the plan is this summary based on?: \*

New Plan

## 630-08-0, Carbon monoxide

630-08-0, Carbon monoxide

### Substances Section Data

#### Statement of Intent

Are the following included in the Facility's TRA Plan?

#### Use

Is there a statement that the owner or operator of the facility intends to reduce the use of the toxic substance at the facility?: \*

No

If 'yes', exact statement of the intent that is included in the facility's TRA Plan to reduce the use of the toxic substance at the facility: \*\*

If 'no', reason in the facility's TRA Plan for no intent to reduce the use of the toxic substance at the facility: \*\*

The facility does not use this substance.

#### Creation

Is there a statement that the owner or operator of the facility intends to reduce the creation of the toxic substance at the facility?: \*

No

If 'yes', exact statement of the intent that is included in the facility's TRA Plan to reduce the creation of the toxic substance at the facility: \*\*

If 'no', reason in the facility's TRA Plan for no intent to reduce the creation of the toxic substance at the facility: \*\*



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, greenhouse gases 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.

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 Carbon Monoxide 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.

## Objectives, Targets and Description

### Objectives

Objectives in plan: \*

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 Carbon Monoxide 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 Carbon Monoxide 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.

### Use Targets

What is the targeted reduction in use of the toxic substance at the facility? \*

No quantity target

Quantity

Unit

or

What is the targeted timeframe for this reduction? \*

No timeline target

years

or

Description of targets

## Creation Targets

What is the targeted reduction in creation of the toxic substance at the facility? \*

No quantity target

Quantity

Unit

or

What is the targeted timeframe for this reduction? \*

No timeline target

years

or

Description of Target

## Reasons for Use

Why is the toxic substance used at the facility?: \*

This substance is not used at the facility

Summarize why the toxic substance is used at the facility: \*\*

## Reasons for Creation

Why is the toxic substance created at the facility?: \*

As a by-product

Summarize why the toxic substance is created at the facility: \*\*

Carbon Monoxide is 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 Carbon Monoxide 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 and the United States Environmental Protection Agency in AP-42.

## Toxic Reduction Options for Implementation

Description of the toxic reduction option(s) to be implemented

Is there a statement that no option will be implemented?: \*

Yes

If you answered "No" to this question, please add the option(s) under the appropriate Toxic Substance



Reduction Categories (e.g. Materials or feedstock substitution, Product design or reformulation, etc.). If you answered "Yes" please provide an explanation below why your facility is not implementing an option.  
Explanation of the reasons why no option will 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.

Materials or feedstock substitution

Product design or reformulation

Equipment or process modifications

Spill or leak prevention

On-site reuse, recycling or recovery

Improved inventory management or purchasing techniques

Good operator practice or training

Rationale for why the listed options were chosen for implementation

General description of any actions undertaken by the owner and operator of the facility to reduce the use and creation of the toxic substance at the facility that are outside of the plan

License Number of the toxic substance reduction planner who made recommendations in the toxic substance reduction plan for this substance (format TSRPXXXX): \*

TSRP0003

License Number of the toxic substance reduction planner who has certified the toxic substance reduction plan for this substance (format TSRPXXXX): \*

TSRP0003

What version of the plan is this summary based on?: \*

New Plan