GUIDELINE

for the

ENVIRONMENTAL MANAGEMENT

of

TIN STABILIZERS

in Canada

Developed in conjunction with a group of vinyl processing facilities, manufacturers of tin stabilizers and vinyl compounding facilities using tin stabilizers

Although the participants in the development of this Guideline believe that the information it contains is factual, it is not intended as a statement of legal requirements with respect to the handling of tin stabilizers. Consult with legal counsel, regulatory specialists and/or appropriate government authorities to ensure compliance with local, regional, national and international laws and regulations. It is the user's responsibility to ensure that proprietary rights and existing laws are observed. No warranty or representation, either expressed or implied, is made with respect to any or all of the content of this document, and the participants in its development do not assume any legal responsibility whatsoever.

TABLE OF CONTENTS

Prefa	ace	iii					
Intro	duction	iv					
1.	Applicability	1					
2.	Glossary of terms and key definitions	1					
3.	Packaging	2					
4.	Storage	2					
5.	Handling and dispensing	4					
6.	Rinsing tanks, totes, drums or lines	4					
7.	Reusable packaging	4					
8.	Spills	5					
9.	Waste disposal	6					
10.	Management system	7					
11.	Documentation	8					
Арре	endices						
Α	Waste disposal location guidelines						
В	Package reclamation and disposal site guidelines						
С	Tin stabilizer handling process flow chart and potential environmental releases of tin stabilizers						
D	Participants in the development of this Guideline						
E	Template letter to be forwarded to the waste disposal company						
G	Annual report for participation in the Guideline for the Environmental Management of Tin Stabilizers in Canada						

Preface

Tin stabilizers have been used in the processing of rigid vinyl (PVC and CPVC) products since the mid-1960s. Tin stabilizers are the most effective type of heat stabilizers that are used in vinyl applications. Because of this and the continued growth of vinyl products in Canada, the overall volume of tin stabilizers used in vinyl processing has risen over the past years. In addition, the methods of handling tin stabilizers have evolved into more efficient, automated and safer systems.

This Guideline has been developed to support all of these changes and to ensure the continued safe, proper and efficient use of tin stabilizers.

Tin stabilizers are part of a diverse family of compounds called "organotins". Tin stabilizers are made from mono- and dialkyltins (monomethyltins, monobutyltins, monooctyltins, dimethyltins, dibutyltins and dioctyltins) which are substantially different from trialkyltins (used as biocides) in toxicological behaviour.

This Guideline addresses in-plant handling methods for tin stabilizers and also the management of tin stabilizer packaging. The practices and procedures outlined in this Guideline are designed to ensure that tin stabilizers do not enter the aquatic environment during use (receiving, storage, handling and dispensing) or through the disposal of materials, by using prevention measures to avoid spills and/or releases to municipal sewer systems, municipal stormwater collection systems and other water treatment systems, receiving waters or surface watercourses.

This Guideline is a voluntary stewardship initiative and in partnership with the Vinyl Institute of Canada (VIC) and industry users of tin stabilizers.

The elements of this Guideline are based on refinements of the 2006, 2015, 2018 and 2020 Guidelines.

The overall goal of this Guideline is to prevent any release of tin stabilizers to the environment, because certain tin stabilizer products may cause harmful effects to aquatic organisms if allowed to enter the aquatic environment.

If you have any questions or require further information about the content of this Guideline, please refer to the contact information in Appendix D.

Purpose

The goal of this Guideline is to prevent the release of tin stabilizers into the environment by ensuring that these substances and their packaging materials are handled, stored, used and disposed of in a responsible manner.

Introduction

PVC, poly vinyl chloride and vinyl are all names given to a widely used polymer/resin. PVC resin can be formulated into a broad spectrum of end-product uses. CPVC is a more highly chlorinated variant of PVC that also uses tin stabilizers.

Vinyl products generally fall into two categories: flexible and rigid.

Flexible vinyl products include floor and wall coverings, automotive interiors, liners for swimming pools and other containers (as found in municipal landfills), edge banding for furniture and skirting, jacketing for wiring and cables, toys, packaging, and medical devices (such as blood bags and tubing).

Rigid end uses, the majority of which are focused in the construction sector, include sewer pipes, water pipes, pipe fittings, window frames, doors, building systems, siding and eavestroughs.

Vinyl is a heat-sensitive material. It must therefore be formulated to meet the end-product specifications and to withstand the various processing stages to which the polymer is subjected. Typically, heat and shear are applied in these processing stages. Exposure of the vinyl to high temperatures for a long period of time can create degradation. If the vinyl is allowed to degrade during processing, hydrochloric acid (HCl) may be released and will act as a catalyst to further degrade the vinyl compound. Heat stabilizers are required in the vinyl formula to scavenge HCl and protect the vinyl from the heat of processing. Tin stabilizers are the most effective type of heat stabilizer in specific applications.

The process stages can include:

- Blending
- Pelletization
- Extrusion
- Injection moulding
- Calendering
- Blow moulding
- Thermoforming

(See Appendix C – Tin stabilizer handling process flow chart and potential environmental releases of tin stabilizers.)

As an example, a blister-packaging product can involve four of these processing stages. Each stage involves some form of heat and shear, hence the requirement for a heat stabilizer in the vinyl compound.

Pure PVC is manufactured as a resin in powder form. The other components in the formula can be liquids or powders. When the basic components are blended together, the mixture becomes the vinyl compound. The vinyl compound is typically in powder or pellet form, but may also be a liquid for some specific applications. The vinyl compound is then further processed into a vinyl product.

To make powder vinyl compounds, the two typical methods of blending are the low-shear, low-temperature ribbon blender or the high–shear, high-intensity mixer, which creates higher temperatures. The high-shear system has a shorter blending time to disperse the various components in the vinyl compound. Liquids are absorbed by the PVC resin, while the other additives (lubricants, fillers, colourants and other powder components) are mechanically dispersed in the resin. Automatic or manual dispensing operations involving the tin stabilizers occur during these compounding steps. During blending, the tin stabilizers are absorbed by the PVC resin and becomes an integral part of the vinyl compound. Although the tin stabilizers are typically a liquid, it can sometimes be dispersed in a carrier to make a powder.

Tin stabilizers, whether liquid or solid, are high-boiling-point materials and therefore have low volatility. They are sensitive to light and moisture and need to be kept dry. In addition, while they can be in contact with stainless steel, they need to be kept out of contact with iron and iron oxide (rust).

Vinyl production has grown significantly in Canada. Tin stabilizers have played an important role in this growth due to their effectiveness. Currently, approximately 28 facilities across Canada compound vinyl and use tin stabilizers. The facilities receive the tin stabilizers in various packaged forms. The high percentage of bulk and semi-bulk packages is an indication of the industry's efforts to minimize handling and environmental risk.

1.0 Applicability

This Guideline applies to all vinyl compounding facilities using tin stabilizers in Canada.

2.0 Glossary of terms and key definitions

<u>Absorbent</u>: A powder or granular material that has a high capacity to absorb and retain liquids.

Aquatic: Relating to the water environment.

<u>Bulk bag (semi-bulk bag)</u>: A woven polypropylene bag that holds large quantities of solid materials, e.g. 1,000 kg.

<u>Bulk tank</u>: An aboveground tank in which large quantities of liquid are stored, e.g. 20,000 kg.

<u>Compound mixer</u>: A machine that blends the components of a formula in a low- or high-shear manner.

<u>Compounding</u>: The mixing of various components to produce a material for subsequent processing into products.

<u>Dike</u>: A raised area around a tank (or other container) to contain and prevent the contents of the tank or container from leaving the area in the event that the tank or container leaks.

<u>Drum</u>: A container used to hold product, e.g. 220 kg.

<u>Designated handler</u>: Usually the supplier or a company designated by the supplier to handle the empty tin stabilizer packaging. For cases where designated handlers are not used, the provisions of section 8 should be followed.

Emissions: Gaseous, liquid or solid releases to the environment.

Environment: Ambient air, water or land.

<u>Drain seal mat</u>: Protective device used to prevent spills from entering drains. Typically, a flexible polyethylene or rubber mat used to cover storm or sewer drains.

<u>Facility</u>: A manufacturing plant where vinyl compounding is performed.

<u>Hose</u>: A flexible tube for carrying or transferring liquids.

<u>Leak</u>: The unintentional release of any material into or out of a container or closed system.

<u>Municipal waste</u>: Any waste, whether or not it is owned, controlled or managed by a municipality, excluding hazardous waste, liquid industrial waste or gaseous waste (but including waste from residential, industrial, commercial and institutional sources).

<u>Municipal waste landfill</u>: A provincially certified landfill site reserved for the disposal of municipal waste.

Rinsate: The residue resulting from the cleaning of a container or piping system.

Tin stabilizers: Specific tin compounds used in formulating vinyl materials.

<u>Tote (semi-bulk container)</u>: A large moveable container that can contain liquids, typically 1,000 kg (also called intermediate bulk container or IBC).

<u>Transfer line</u>: A connection from one vessel to another, typically through a pipe or a hose.

3.0 Packaging

Tin stabilizers are commercially available in different types of packaging.

Liquids can be shipped to the facility by bulk trucks (20,000 kg), which are typically dedicated, or in totes (1,000 kg), drums (220 kg) and small pails (20 kg or less). Totes are usually reused, recycled, or disposed of according to subsection 9.2. Drums and pails, which represent a very small part of overall consumption in the Canadian industry, are normally one-way containers and are disposed of by the end user of the tin stabilizer, as per subsection 9.2 of this Guideline.

Powders may be in semi-bulk bags (1,000 kg) or small bags (20–25 kg). Semi-bulk bags can be returnable or one-way. Small bags are one-way.

The type of packaging determines the method by which the tin stabilizers are stored and introduced into the blending system.

4.0 Storage

Liquid tin stabilizers are sensitive to moisture and contamination by iron. Long-term exposure to light may also have a negative effect on some tin stabilizers. Store all packages well away from sources of flame or heat. Storage tanks, totes, drums and pails containing tin stabilizers should be inspected for leaks, structural integrity and any

sign of deterioration on a routine basis. Review the tin stabilizer Safety Data Sheet (SDS) to check for potential incompatibility with other stored materials.

Accidental spills should be prevented. Drums and totes need to be protected during storage and use to prevent containers from being accidentally damaged by mechanical devices or vehicular traffic. Potential releases of tin stabilizers through improper drainage to the environment should be prevented by using dikes or spill pallets, closing floor drains, etc. If a spill occurs, please see section 8.0 for guidance on what to do.

4.1 Bulk

Construction materials for bulk storage tanks can be stainless steel, aluminum, high-density polyethylene (HDPE) or lined carbon steel. Care should be taken to ensure that the lining is compatible with the tin stabilizer. If in doubt, check with the tin stabilizer supplier.

Some bulk storage tanks are located indoors and are vented inside the facility. Air monitoring in process plants has confirmed that, because of the low volatility of tin stabilizers, there is little or no emission to the ambient atmosphere in the facility. Some exposure to humidity exists, but with reasonable inventory turnover, there is no negative effect on tin stabilizer quality. In the case of extended storage with no use, care in sealing the vessel against humidity is advisable.

All bulk storage tanks should be placed inside a dike in accordance with bulk storage guidelines. The latest guidelines from the Ontario Ministry of the Environment, Conservation and Parks are dated May 2007 and can be accessed at http://www.ontario.ca/environment-and-energy/guidelines-environmental-protection-measures-chemical-and-waste-storage. The guidelines advise that the capacity of the dike should be the greater of 110% of the volume of the largest tank or 100% of the volume of the largest tank plus 10% of the aggregate volume of all remaining tanks. Tin stabilizer users outside Ontario should check whether their provincial environment department has relevant guidelines; otherwise, the Ontario bulk storage guidelines should be followed. The dike should be constructed and maintained so as to eliminate the possibility of unintentional releases of tin stabilizers to the environment in the event of tank failure and should be kept clean to prevent contamination by any other material in the dike. The dike prevents material loss and allows recovery and reuse.

For bulk tanks venting to outdoors, check the requirements of the applicable provincial regulations in case a permit or Certificate of Approval is required.

4.2 Totes

Typical construction materials for totes are stainless steel, aluminum and HDPE. Ensure that the tote is well sealed before and after use to prevent contact with humidity. Store totes in a designated indoor area and protect them from damage by mechanical devices, vehicular traffic and heat or flame.

4.3 Drums and pails

These are typically HDPE or steel containers with an interior coating to protect the tin stabilizers from contamination with rust. Ensure that containers are sealed when not in use. Protect them from weather and from damage by mechanical devices, vehicular traffic and heat or flame.

5.0 Handling and dispensing

Transfer lines to and from storage tanks, totes or drums should be made from stainless steel tubing/piping or special chemical transfer hoses. All hoses should be compatible with the tin stabilizers. Proper precautions should be exercised to prevent spills when handling and transferring from drum to drum, tote to tote, bulk truck to tote, truck to storage area, etc. A drain seal mat should be placed over the storm drains and sewer drains during unloading. The drain seal mat should be maintained in good condition to achieve a proper seal. Automatic start-up of sump pumps should be turned off during unloading and handling to prevent an inadvertent leak or spill of tin stabilizers into the storm or sewer drains. Adequate containment, such as drip pans, is required to prevent residual product drips from valves and connections from entering the environment. Discharge points of the floor drains and sump pump system should be known at all times and be considered in the work instructions and practices to prevent spills and leaks into the aquatic environment. Transfer lines, pipes and hoses should be periodically inspected to ensure there are no leaks.

Transfers from bulk trucks should be constantly attended, and audible alarms should be used to ensure that action can be taken immediately if a transfer line is breached or a tank is filled to capacity. Bulk unloading procedures should include a reference to required spill prevention measures and appropriate spill containment steps.

6.0 Rinsing tanks, totes, drums or lines

Rinsing of tin stabilizer transfer lines is not typically required. Water is not the recommended material for rinsing or purging the line, because it is not compatible with vinyl processing.

In the event that a transfer line requires purging before a change in the tin stabilizers is made, a tin stabilizer–compatible liquid such as epoxidized soybean oil (ESO) is recommended. Any ESO or vinyl-compatible rinsate generated from rinsing a transfer line, tote, drum or pail should be recycled back into a vinyl compound.

7.0 Reusable packaging

Totes and drums can be reused, recycled, or disposed of depending on supplier and user circumstances. After the contents have been used, and before the packaging is returned to a designated handler, it is important to properly seal the empty package. This includes, but is not limited to, closing valves, caps, lids, etc. to prevent loss of residual product from the package to the environment. This also eliminates the possibility of foreign materials or objects entering the container, which could have an adverse effect on the reuse of the package. The empty packaging should also be stored in accordance with section 4.

In most cases, reusable totes are managed by the supplier. Contact information is available on the container or from the tin stabilizer supplier.

Store all packaging correctly and, when returning it to the supplier or designated handler, ensure that the previous contents of the packaging (i.e. TIN STABILIZERS) are indicated on the bill of lading.

8.0 Spills

In the event of a spill of tin stabilizers, the company should immediately take all necessary measures to contain and prevent any release into the environment. The first priority is to minimize the amount of the spill and to cover all drains with a well-maintained drain seal mat in the surrounding area. Isolate or interrupt the flow by immediately closing a valve, rotating a drum or transferring the contents to minimize the spill. It is advisable to keep a spill kit and an empty tote or drum available and accessible near high-risk areas for transfer purposes.

For product that may be on the floor, PVC resin or industrial absorbent can be used to contain and absorb the spill. PVC powder is an ideal medium for soaking up small spills and can be incorporated into a vinyl compound for further processing. All spills, leaks and liquid waste should be collected as soon as possible and either recycled or placed in a sealed container labelled "Waste for disposal – contains tin stabilizers" prior to disposal in accordance with section 9.

If a spill of tin stabilizers enters the environment, promptly follow the containment and reporting procedure set out in section 10.

In addition, the company should notify the appropriate federal, provincial/territorial or municipal authorities in accordance with applicable legislation. With respect to federal requirements, in the event of a spill or environmental emergency, the following Government Canada website provides information on when to report and who to notify: https://www.canada.ca/en/environment-climate-change/services/environmental-emergencies-program/report-emergency.html. The streamlined reporting is enabled under the authority of the Regulations under the Canadian Environmental Protection Act, 1999 (CEPA) and

the <u>Deposit Out of the Normal Course of Events Notification Regulations</u> under the Fisheries Act.

The following spills will be tracked by the facility and will be noted in the Annual Report, (Appendix G):

- spill is reportable under federal and provincial/territorial regulations
- spill within the property (any volume) and is released into the environment.

All operations should track all spills and to document the cause, response, and steps taken to prevent a recurrence. Attention to patterns in these data will allow for improvement in manufacturing practices.

9.0 Waste disposal

Currently, most tin stabilizers are not regarded as hazardous substances and are therefore not subject to hazardous waste handling regulations in most provinces. However, concerns about tin stabilizers being released to the environment are very real.

As noted in the preface, "the overall goal of this Guideline is to prevent any release of tin stabilizers to the environment, because certain tin stabilizer products may cause harmful effects to aquatic organisms if allowed to enter the aquatic environment."

To meet the goal of this Guideline, waste containing tin stabilizers shall not be disposed of at a municipal waste landfill site. Facilities should dispose of any waste containing tin stabilizers at a landfill or incinerator that is certified to handle hazardous materials. Below are, for example, two known sites in Canada equipped to handle hazardous materials:

Clean Harbors Canada Inc. 4090 Telfer Road, Rural Route #1 Corunna, ON N0N 1G0 Phone: 519-864-3970

https://www.cleanharbors.com/location/corunna-incineration-facility-industrial-services

Swan Hills Treatment Centre Mail Bag 1500 10000 Chrystina Lake Road Swan Hills, AB T0G 2C0 Phone: 780-333-4197

http://www.shtc.ca/

The waste disposal companies chosen by facilities should demonstrate that the waste containing tin stabilizers is disposed of at a landfill or incinerator that is certified to handle hazardous material (see Appendix E for a template letter that could be used as a model by the waste disposal company). When the disposal is handled through a waste

disposal company, ensure that the content of the waste to be disposed (i.e. TIN STABILIZERS) is indicated on the waste manifest.

9.1 Material

Spilled material and liquid waste should be collected as soon as possible and placed in a sealed container for later reuse or disposal. Where possible, non-aqueous rinsate, recovered solids or spilled material should be reused in the manufacturing process. If reuse is not possible, these materials should be properly packaged and disposed of at a suitable waste facility.

In the unlikely event that tanks, totes, drums or lines are cleaned with water at a compounding facility, the aqueous rinsate from this process should be collected and stored in suitable packaging, such as a used tote or drum, for later disposal.

Solid waste containing tin stabilizers, such as absorbent, should be collected as soon as possible and stored in a sealed container for later disposal.

Liquid waste, including rinsates, will require a manifest for lawful transfer and disposal in most Canadian jurisdictions. Such rinsate should be assigned the correct waste number as per provincial regulations.

Under no circumstances should any water rinsate or other liquid rinsate be disposed of in municipal sewer systems, municipal stormwater collection systems and other water treatment systems, receiving waters or surface watercourses.

9.2 Non-reusable packaging

Do not dispose of non-reusable packaging at municipal waste landfill sites. Close the package properly once the contents have been used. Because the

shipment of empty containers does not require special permits, only reputable packaging disposal and recycling companies should be used. These companies should be required to demonstrate that their rinsate is not released into the aquatic environment. (See Appendix A for guidelines on selecting these companies and Appendix E for a template letter that could be used as a model by the waste disposal, packaging disposal or recycling company) If recycling is not feasible, the packaging should be disposed of at a hazardous waste facility as described in this section. When shipping these containers, make sure the bill of lading reflects the original contents of the packages to ensure that they are dealt with correctly.

Criteria for waste disposal may vary from province to province. Waste haulers, receivers of cleanup products after a spill, or companies accepting empty packaging and/or contaminated items may need to have appropriate permits to handle these materials. It is the responsibility of the facility using tin stabilizers to

ensure that the contracted waste management provider is operating under the necessary authority.

Depending on the nature of the waste product, the facility may also need to have a waste generator number. (See Appendices A and B for guidelines to be considered in selecting an appropriate disposal site.)

10.0 Management system

All facilities using tin stabilizers should have a set of work instructions for these materials, with appropriate documentation. These work instructions will address the following:

- Tin stabilizers receiving, storage and handling procedures
- Handling of empty packaging
- Waste material collection, storage and disposal procedures
- Spill containment and spill reporting procedures

Facilities should provide training on the above procedures and maintain training records.

11.0 Documentation

The following records should be kept at the facility using tin stabilizers for a minimum of two years or the duration required under provincial regulations. This will facilitate annual reporting to the VIC, which will demonstrate to stakeholders that this Guideline is being followed.

- A copy of the waste manifest, if applicable, showing the date, amount, waste class and receiver of any rinsate or liquid waste containing tin stabilizers
- A copy of the paperwork and bill of lading showing the date, number of items and designated receiver of any solid waste containing tin stabilizers (absorbent materials, rags, contaminated clothing, etc.)
- A copy of the paperwork and bill of lading relating to the return of the returnable packaging (i.e. non-bulk) to a supplier showing the date, number of pieces and designated receiver
- A copy of the paperwork and bill of lading relating to the shipment of waste packaging, showing the type and number of items, the original product in the waste packaging and the designated receiver
- Where applicable, documentation to verify that the receivers of the rinsate, waste materials, waste non-reusable packaging or returnable packaging

- meet the regulatory requirements and the intent of this Guideline (see Appendix E for a template letter to be forwarded to waste disposal company).
- Documentation related to spill notification and reporting requirements for releases of tin stabilizers to the environment, identifying the date, amount, cause and corrective action

The VIC will consolidate the annual reports and provide a consolidated annual report to Environment and Climate Change Canada.

Appendix A

Waste disposal location guidelines

Requirements vary by province. Check the provincial regulations as well. Typical certificates that the site might have are:

- Certificate of Approval Waste Carrier
- Certificate of Approval Waste Receiver
- Certificate of Approval Waste Generator (also for the compounding facility)

It is the responsibility of the compounding facility to verify that the waste carrier and disposal site have suitable permits, depending on the waste product and province.

Appendix B

Package reclamation and disposal site guidelines

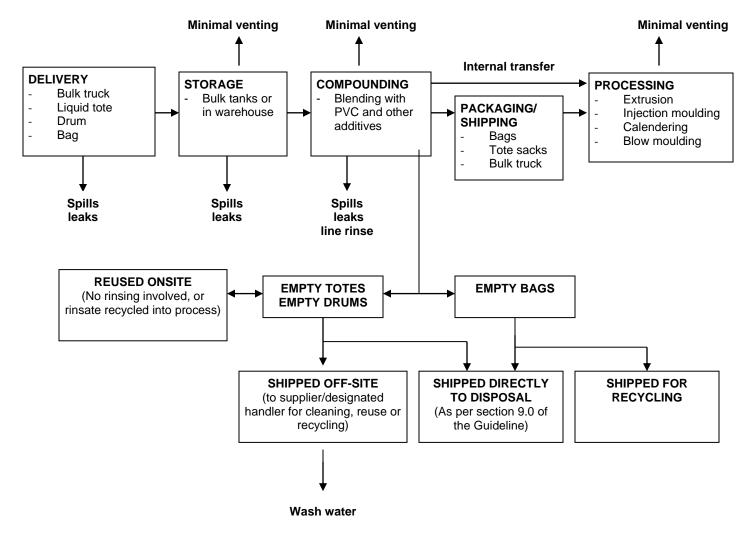
Requirements will vary by province. Check the provincial regulations. Typical certificates that the site might have are:

- Provincial Ministry of Environment Certificate of Approval (Air)
- Provincial Ministry of Environment Waste generator registration number, including waste stream and waste number
- Provincial Ministry of Environment Provisional Certificate of Approval for a waste disposal site
- Transport Canada, Safety and Security, Dangerous Goods Certificate of registration pertaining to standard CAN/CGSB-43.146-2022 "Design, manufacture and use of intermediate bulk containers (IBCs) for the transportation of dangerous goods, classes 3, 4, 5, 6.1, 8 and 9" (https://tc.canada.ca/en/dangerous-goods/can-cgsb-43146)
- Transport Canada, Safety and Security, Dangerous Goods Certificate of registration pertaining to standard CAN/CGSB-43.126-2019 "Reconditioning, Remanufacturing and Repair of Drums for the Transportation of Dangerous Goods" (https://tc.canada.ca/en/dangerous-goods/standard-can-cgsb-43126-reconditioning-remanufacturing-repair-drums-transportation-dangerous-goods)
- Insurance coverage
- Workplace Safety and Insurance Board (WSIB) Clearance certificate
- Management system for the safe handling and disposal of containers and recycled packages

It is the responsibility of the compounding facility to verify that the waste package receiver has all appropriate permits.

Appendix C

Tin stabilizer handling process flow chart and potential environmental releases of tin stabilizers



NOTES

Site measurements indicate that losses due to venting are minimal.

Storage tanks, process vessels, transfer lines, etc. are very rarely, if ever, washed with water.

If the compounding is done at the same site as the processing then the compound is internally transferred to the processing area, without release to the environment.

After processing, the tin stabilizers are fused within the PVC matrix. Any potential losses to the environment will be insignificant.

Appendix D

Participants in the development of this Guideline

This is a continuation of the Canadian vinyl industry's efforts in support of the responsible management of tin stabilizers. For the names of specific industry participants, see contact information below.

Contact information for stakeholder follow-up:

Aiñe Curran President and CEO Vinyl Institute of Canada 6249 St. John Street #4 Niagara Falls, ON L2J 1C6

Phone: 416-890-5553

Email: aine@vinylinstituteofcanada.com

Appendix E

Template letter to be forwarded to the waste disposal, packaging disposal or recycling company

Tin Stabilizer Waste Management Company Letterhead (logo)

Date

Addressed to facility requesting the letter

RE: DISPOSAL OF WASTE CONTAINING TIN STABILIZERS

This will confirm that ABC Company is aware that waste which may contain tin stabilizers (including any cleaning materials of containers which previously contained tin stabilizers), are to be disposed of in accordance with the document titled "Guideline for the Environmental Management of Tin Stabilizers in Canada". Furthermore, we understand that all waste materials should be prevented from entering the aquatic environment.

At ABC Company, we agree to only ship waste materials that contain tin stabilizers to facilities that can dispose of it by hazardous landfill, hazardous waste incinerator, or other equivalent methods that prevent tin stabilizers from entering the aquatic environment.

At ABC Company, we are proud of the trust that we've received from this industry and are determined to maintain that trust. Please feel free to contact me at xxx xxx xxxx, or via email at email address with any questions or concerns regarding our waste disposal practices.

Sincerely,

Signature of Manager/or Signing Officer.

ABC Company Insert address

Appendix G

Annual report for participation in the Guideline for the Environmental Management of Tin Stabilizers in Canada

Com	pany:								
Facility address:									
Prepared by:					Telephone:				
Position title:					Email address:				
Repo	orting period:	April 1 st ,	- March 31	,	Date completed:				
		-							
1	Tin stabilizer								
		type of p	ackaging in wh	ich tin stabilizer is rec	eived at the facility.				
1a	Drums								
1b	Totes/IBCs								
1c	Bulk trucks								
1d	Other (please describe)								
2	Tip otobilizer	otorogo							
	Tin stabilizer		and stored at th	ne facility as described	t in section 4 of the G	uidalina?			
	Yes	iai iageu a	If "no," please ex		in section 4 or the G	uidelii ie :			
2b	No								
3	Tin stabilizer	handling	g and dispensi	ing					
Are t	in stabilizers ha	andled ar	nd dispensed a	t the facility as describ	oed in section 5 of the	Guideline?			
3a	Yes		If "no," please ex	plain:					
3b	No								
	'	'	·						
4	Tue etwe ent ef	wine a 4 a /	anation C of the	· Cuidalina)					
	Treatment of			· · · · · · · · · · · · · · · · · · ·	rting year through the	rinsing of tanks, lines or containers			
	ns, totes/IBCs,			acility during the repor	itting year timough the	Thising of tanks, lines of containers			
	Yes			xplain the source of the rins	sate:				
_	No		7						
_	If "yes," please indicate applicable disposal treatment:								
	4c Rinsate was reused in the process according to section 6 of the Guideline.								
4d		Rinsate was disposed of at a secure landfill or incinerated.							
4e				at a wastewater treatm					
4f		Other (please explain):							

5	5 Waste contaminated with tin stabilizer							
Did the facility generate any waste containing tin stabilizer during the reporting year?								
5a	Yes		If "yes," state the form of the waste generated:					
			Solid (rags, gloves, absorbent, etc.):	Solid (rags, gloves, absorbent, etc.): Liquid (obsolete/residual material, etc.):				
5b	No		If "no," please explain why no waste was g	enerated:	·			
If "ye	es," was the waste m	ana	ged according to section 9 of the G	uideline?				
5c	Yes		If "no," please explain:					
5d	No							
Was	waste containing tin	stal	pilizer sent out for disposal during t	he reporting ye	ear?			
5e	Yes		If "no," please explain:					
5f	No							
		sura	nce in writing from the waste mana	gement contra	ctor that waste containing tin st	tabiliz	zers will be	
			or incinerator that is certified to han					
5g	Yes		lf "no," please explain:					
5h	No							
Doe was		rec	ords for all shipments of waste con	taining tin stab	illizer, including information on a	all ha	ndlers of this	
5i	Yes		If "no," please explain:					
5j	No							
6	Empty containers							
If the facility put a checkmark beside 1a and/or 1b, what type of totes/IBCs or drums were used to receive tin stabilizers during the reporting year?								
6a	Stainless steel		The empty stainless steel totes or drums a	re:				
			Returned directly to the supplier:		Sent to a tote refurbisher:			
			Reused at the facility:		Not applicable:			
6b	Plastic/metal cage		The empty plastic/metal cage totes or drun	ns are:				
			Returned directly to the supplier:		Sent to a tote refurbisher:			
			Reused at the facility:		Not applicable:			
Are	the empty re-usable	totes	s/IBCs or drums handled as describ	ped in section 7	7 of the Guideline?			
6c	6c Yes If "no," please explain:							
6d	6d No							
Is the non-reusable packaging, if any, handled as described in subsection 9.2 of the Guideline?								
6e	6e Yes If "no," please explain:							
6f	No							
Does the facility have assurance in writing from the tote/IBC or drum refurbisher that waste containing tin stabilizer will not enter the aquatic environment?								
_	Yes		If "no," please explain:					
	No		_					
Does the facility maintain records for all shipments of empty tin stabilizer totes/IBCs or drums, including information on all								
	dlers of these contain		· · ·					
6i	Yes		If "no," please explain:					
6j	No							

	_									
7 Work instructions										
				e, does the facility m			ons/practices and tra	aining	records relating	
to the use of tin stabilizer materials that address the following ("X" all applicable)?										
Receiving			Storage			Handling				
Empt	ty packaging			Waste disposal			Spill			
8	8 Spills									
Does the facility have a functioning, documented spill response plan in place that contains the elements described in section 8 of the Guideline?										
	Yes		If "no," please expla	in:						
8b	No									
Did tl	ne facility have a	any ti	n stabilizer spills	during the reporting	year	(see section 8 of th	ne Guideline for spills that	should	be tracked by the	
facility										
8c	Yes		If "yes," please indic							
			·	the facility that met the de			_			
04	Nia	T	Estimated volume o	f all tin stabilizer spills (in	litres):					
8d	INO									
9	Documentation	n								
		on lis	ted in section 1	1 of the Guideline be	en ke	pt at the facility	according to the req	uirem	ents of that	
section	I		If "no " places	avalain.						
_	Yes		If "no," please explain:							
9b	No									
10	Significant cha	ange								
Pleas	se indicate whet	her c	ne or both of the	e following situations	have	occurred at you	ur facility during the	curren	t reporting period:	
10a				the mode of supply mer agreement (202						
10b				ocated its tin stabilize	er–rela	ated infrastructu	ire since the end of t	he for	mer agreement	
100		or the current agreement.								
	Briefly describe the significant change.									
If a v	If a vinyl compounding facility has started using tin stabilizers and was not verified under the former agreement, or a									
facili	ty has relocate	ed its	vinyl compour	nding facility to a ne						
because it is considered a new facility.										
11 Guideline implementation										
Has the Guideline for the Environmental Management of Tin Stabilizers in Canada been fully implemented at the facility?										
	11a Yes									
11b										

Thank you for completing Appendix G. This document will not be forwarded to Environment and Climate Change Canada directly, but will be aggregated with the results from other facilities' forms and then submitted to Environment and Climate Change Canada as a consolidated industry report.

Please forward the completed form to:

Vinyl Institute of Canada 6249 St. John Street #4 Niagara Falls, ON L2J 1C6

Attention:
Aiñe Curran
President and CEO
Vinyl Institute of Canada
Phone: 416-890-5553

Email: aine@vinylinstituteofcanada.com