

**2019 Annual Public Reporting for Toxic Substances
Phosphorus (Total)**

Facility and Contact Information

Facility NPRI No.	2122
Facility MOE No. if assigned	Not assigned
Company legal and trade names of owner and operator of the facility	Shell Canada Limited
Facility street/ mailing address	Brockville Lubricants Plant 250 Laurier Blvd. Brockville, Ontario, K6V 5V7
Name, position, telephone no. of facility public contact	Stephen Doolan Downstream Communication Manager 403-691-3143 400 4th Avenue Southwest, Calgary, Alberta, T2P 2H5
No. of full-time employee equivalent	70
2, 4, and 6 digit NAICS Codes	31-33 Manufacturing 3241 Petroleum and coal product manufacturing 324190 Other petroleum and coal product manufacturing
UTM spatial coordinates with NAD83 datum	18T 445136 Easting 18T 4941437 Northing
Legal name of Canadian parent company	Shell Canada
Street and mailing address of parent company	400 4th Avenue Southwest, Calgary, Alberta, T2P 4V8
Percentage ownership of facility	100

Toxic Substance Plan Information

Name and CAS numbers of toxic substance for this report	Phosphorus (Total), NA-22
Name and CAS numbers of other substances created or used at facility	Zinc and its compounds, NA-14
Date of most recent plan	November 23, 2016
Objectives of plan, and targets	Shell has a history of safe and responsible use of hazardous materials in Brockville, and has already invested significant resources to contain, recycle, and minimize the use of all hazardous materials. Going forward, Shell is committed to continuing to reduce the amount of phosphorus used by assessing material or feedstock substitution, product design or reformulation, equipment or process modification, spill and leak prevention, on-site reuse or recycling, improved inventory management or purchasing techniques, and training or improved operating procedures. The actual usage of phosphorus and achieved reductions will be documented and made available to public and Shell employees
Summarize any amendments to the plan	There were no amendments made to the plan.
Summarize the steps taken during the reporting period towards achieving the objectives of the plan	Four options were selected in the current 2016 TR plan. Steps were taken in previous years, but no additional steps were taken in 2019
Summarize the effectiveness of the steps taken during the reporting period	Actions for the three plans selected were effectively implemented in previous years. No additional steps were taken in 2019

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Review implementation progress and timelines set out in the plan	All planned steps for the three selected options were implemented in previous years. No additional steps were taken in 2019
Summarize actions taken in this reporting year that were additional to the steps described in the plan	There were no action steps taken outside of the plan in 2019

Annual Reporting Metrics

Phosphorus (Total)	Used & Product, tonne			On-site Releases, tonne			Disposals, tonne		Off-Site Recycled, tonne
	Used	Created	In Product	Air	Land	Water	On-Site	Off-Site	
Previous Year	86.354	0	86.14	0	0	0	0	0.000	0.214
Current Year	84.005	0	83.235	0	0	0	0	0.000	0.770
Difference	-2.349	0	-2.905	0	0	0	0	0.000	0.556
Percent Difference	-2.72%	0%	-3.37%	0%	0%	0%	0%	0%	259.81%
Reductions in plan	0	0	0	0	0	0	0	0	0
Reductions outside plan	0	0	0	0	0	0	0	0	0
Total Reductions	0	0	0	0	0	0	0	0	0
Percent Reductions	0%	0%	0%	0%	0%	0%	0%	0%	0%
Rationale for changes	Normal product mix variations with different formulations cause year to year differences in substances used and substances contained in product. Additional off-site recycling of materials was required due to on-site maintenance and cleaning activities that vary from year to year.								

Certification

As of June 1, 2020, I, Kelly McKinnon, certify that I have read the report on the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the information contained in the report is factually accurate and the report complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Phosphorus (Total)

Original Document Signed

Kelly McKinnon, Plant Manager