

**2018 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 2018 |
| 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 2018 |

**2018 Annual Public Reporting for Toxic Substances
Phosphorus (Total)**

| | |
|--|---|
| 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 2018 |
| 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 2018 |

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 | 84.291 | 0 | 83.861 | 0 | 0 | 0 | 0 | 0.000 | 0.430 |
| Current Year | 86.354 | 0 | 86.14 | 0 | 0 | 0 | 0 | 0.000 | 0.214 |
| Difference | 2.063 | 0 | 2.279 | 0 | 0 | 0 | 0 | 0.000 | -0.216 |
| Percent Difference | 2.45% | 0% | 2.72% | 0% | 0% | 0% | 0% | 0% | -50.23% |
| 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. The reduction in off-site recycling was due to normal differences in maintenance activities that occur from year to year. | | | | | | | | |

Certification

As of June 1, 2019, 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