

# Ontario, Yours To **POLLUTE** Discover

A Report on Ontario's Wastewater Violations 1995-2000



Sierra Legal Defence Fund  
October 2001

## **Acknowledgements**

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# **SIERRA LEGAL DEFENCE FUND**

### **ONTARIO OFFICE**

30 St. Patrick Street Suite 900  
Toronto, Ontario  
M5T 3A3  
Phone: (416) 368-7533 (SLDF)  
Fax: (416) 363-2746  
Email: [sldfon@sierralegal.org](mailto:sldfon@sierralegal.org)

**Website: [www.sierralegal.org](http://www.sierralegal.org)**

The Sierra Legal Defence Fund is a charitable organization that provides free legal services to environmental groups across Canada. Sierra Legal aims to enhance public access to the legal system, set important legal precedents that will strengthen existing laws, and provide professional advice on the development of environmental legislation.

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## Introduction

*Ontario, Yours To Pollute* is the Sierra Legal Defence Fund's third annual report on wastewater discharge violations by Ontario's industrial and municipal facilities. The information presented in this report was obtained from the Ministry of the Environment (MOE or Ministry) under the *Freedom of Information and Protection of Privacy Act*. This information was provided after a 16-month battle that resulted in an Order from the Ontario government's own Information and Privacy Commission requiring MOE to release the information to Sierra Legal free of charge.

Sierra Legal's two previous reports on Ontario's wastewater dischargers revealed that the total number of violations of Ontario's wastewater laws tripled between 1996 and 1998. This report provides an analysis of the recently released MOE data, showing that violations in 1999 stayed at that same high level and that many of the violating facilities continued to exceed wastewater limits in 2000. The report is based on the most recent data available from the MOE.

This research also revealed that the MOE laid charges against only 6 of 168 violating facilities for exceeding wastewater discharge limits in 1999 – and only 11 facilities since 1995. Given the more than 10,000 violations that have occurred by approximately 480 facilities during the same period, it appears that the MOE's continued reliance on 'voluntary' action from violators has proven to be an extremely ineffective method to ensure compliance with the law.

This report begins with a review of the difficulties encountered in retrieving the information for the report and provides a brief overview of Ontario's wastewater laws. The remainder of the report summarizes the MOE data and highlights Ontario's worst wastewater violators – including the 'Filthiest Four' polluters for 1999 and the province's most notorious repeat offenders.

*Ontario, Yours To Pollute* also provides investment information for all publicly held companies in the top 50 polluters of 1999. We encourage citizens concerned about the effects these companies have on our shared water resources to consider this report in making investment decisions. We also encourage concerned citizens to phone, fax or write these companies and express your concern and ask that they clean up their act.

This report also provides information on how to contact local MOE district offices. Concerned individuals can contact the MOE district office shown in the table and speak to the district manager and tell him or her how you feel. You can ask them to get tough with these polluters and prosecute them for their violations. You can point out that in many cases years of 'voluntary abatement' measures have proven ineffective.

## Ministry Ordered to Release Non-compliance Information

The information presented in this report was obtained from the Ministry of the Environment under the *Freedom of Information and Protection of Privacy Act*. This information was provided after a 16-month battle that resulted in an Order from the Ontario government's own Information and Privacy Commission (IPC) requiring MOE to release all information regarding non-compliance with provincial wastewater limits to Sierra Legal free of charge.

In its decision, the IPC found that the MOE has been consistently unable to disseminate information on public health issues in a “comprehensible fashion,” and asserted that watchdog organizations such as Sierra Legal provide an important public service – protecting Ontarians from secretive government agencies unwilling to disclose information on public health issues.<sup>1</sup>

This ongoing struggle for information began in 1997, when Sierra Legal first requested MOE data on the non-compliance of provincial wastewater limits. Each subsequent year, Sierra Legal has been forced to go through lengthy appeal processes after Ministry officials attempted to extract enormous fees from the non-profit organization for obtaining public documents and data – and each time, through appeals to the IPC, the MOE has been forced to release the information free of charge.

As a result of Sierra Legal's work, the MOE now reports on municipal and industrial non-compliance through their web site, but the quality of the information continues to be woefully inadequate. The reports posted on their site do not provide any information with respect to the *number* of violations by each facility, or the total number of violations in the province. Furthermore the MOE omits many dischargers from their report - in essence, misleading the public.

## Breaking the Law: Wastewater Non-Compliance

This report discusses non-compliance with provincial laws governing industrial and municipal wastewater discharges, and with non-compliance standards set by a facility's certificate of approval or provincial objectives and guidelines. Wastewater discharge is regulated by a set of nine regulations under the *Environmental Protection Act* (EPA), referred to as the *Municipal Industrial Strategy for Abatement* (MISA) regulations. MISA regulations set pollutant limits for wastewater discharged by industrial facilities. Similarly, Certificates of Approval, which are issued under the EPA or the *Ontario Water Resources Act* (OWRA), also establish limits for pollutants being discharged by a facility. In some cases, reports of municipal discharger non-compliance may be of objectives and/or guidelines and not legally enforceable standards. Similarly, in some cases reports of industrial non-compliance prior to the establishment of the MISA regulations may be of

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<sup>1</sup> To review the Order, please visit [www.ipc.on.ca/english/orders/orders-p/po-1909.htm](http://www.ipc.on.ca/english/orders/orders-p/po-1909.htm)

guidelines or objectives. **In this report, the violations noted are when companies exceed these limits.** All information regarding violations is based on data obtained from the MOE through Freedom of Information (FOI) requests and IPC appeal orders.

There are hundreds of facilities in Ontario that must abide by wastewater discharge limits set by MISA regulations or certificates of approval. However, each year there are facilities that seem to consistently violate those rules and discharge harmful pollutants into Ontario's waters. Many of these facilities are repeat offenders in that they consistently violate the wastewater discharge limits year after year with impunity.

This report profiles all companies that had more than 10 violations of wastewater discharge standards in 1999. Of the 168 industrial violators of Ontario's wastewater discharge laws in 1999, 50 of the facilities had 10 or more violations, and this report focuses on those facilities and their history of non-compliance. This level of non-compliance was chosen as a cut off point for two reasons; (1) it helps focus attention on chronic violators, and (2) this level of violations cannot simply be explained as unusual "accidents" or a "glitches in the treatment system".

Although Sierra Legal had requested information pertaining to legal actions pursued by the MOE against facilities in violation of the wastewater limits, a review of the MOE materials provided under the FOI process showed that there was no reference made to prosecutions or charges being laid. Instead, this information was retrieved by searching MOE media releases for announcements of any charges related to wastewater discharge violations. When MOE officials were contacted to verify these figures, Sierra Legal was informed that this information is not readily available and could only be retrieved through another FOI request. Sierra Legal did initially request this information through an FOI request. However, it was not provided to us and we have therefore estimated the number of charges laid by reviewing all MOE press releases pertaining to charges laid for violations in 1999.

The tables included in this report detail non-compliance information for 1999, but also refer to available MOE non-compliance information for 2000. The MOE has still not released non-compliance data from 2000 to Sierra Legal, but has simply reported on its website whether facilities were in non-compliance in 2000. Thus, this report does not provide *numbers* of violations for 2000, but does indicate if a facility was in non-compliance during the year 2000.

The report takes the form of a series of tables that list the following information:

- **Facilities** – all 50 facilities with more than 10 violations in 1999 are listed under the MOE Region in which the facility is located.
- **Wastewater Discharge Violations** – detailed 1999 non-compliance information for each facility including the pollutants involved and the number of violations for each pollutant.
- **History of Non-Compliance** – facility non-compliance information from 1992 to 1999 according to Sierra Legal and MOE reports, and whether the facility was non-compliant in 2000.

- **Investor Information** – provides information for publicly held companies such as the stock exchange where the polluting company or a related company is listed and the company's stock symbol.
- **Contact Information** – provides information on how a concerned citizen can contact the company that owns the facility, or the facility itself.
- **MOE Action and Contact Info** – provides information on what MOE claims it has been doing to deal with the offending parties, as well as information on how to contact the local MOE office that is overseeing the regulatory compliance of the facility.

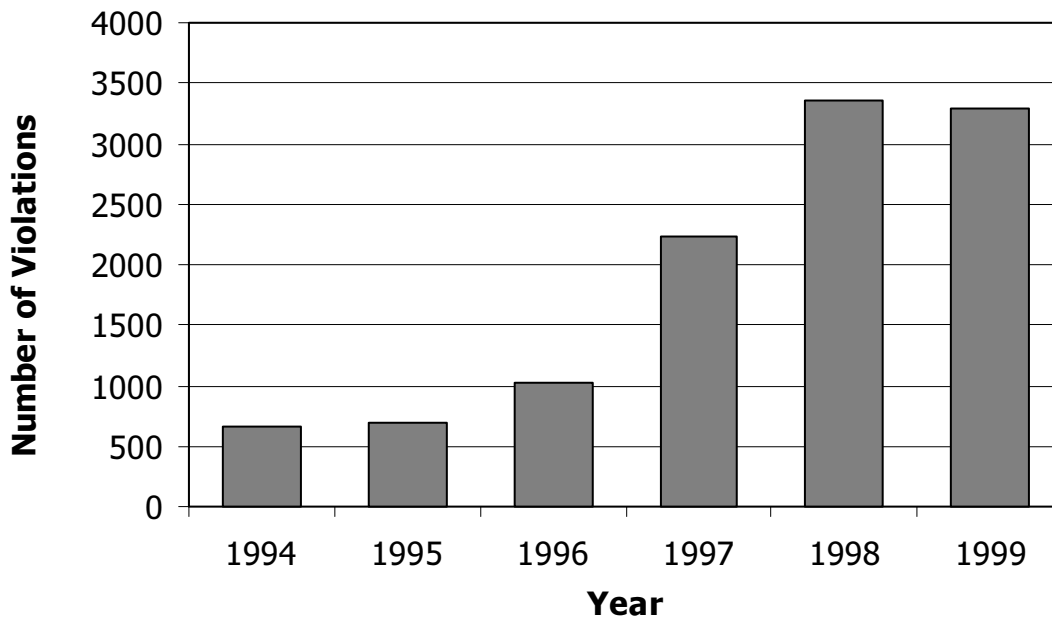


## Discussion and Major Findings

### Annual violations have tripled since 1995 - Over 10,000 violations since 1995

Violations by the municipal and industrial sectors in 1999 (the most recent data available from the MOE) continued to be more than triple the number of violations before 1995, as illustrated in Graph 1. As discussed in the previous Sierra Legal reports, there were 1013 violations in 1996, 2234 in 1997 and 3363 in 1998. In 1999 there were an additional 3296 violations of provincial wastewater laws, which brings the total to well over 10,000 violations since 1995. The province has responded during this period by laying charges against only 11 facilities.

**Graph 1: Ontario Wastewater Violations 1994-1999**



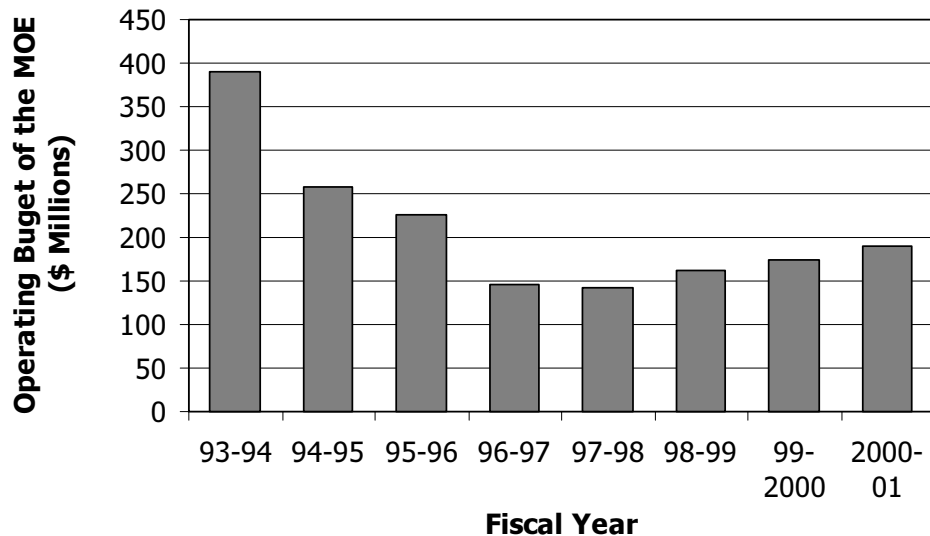
The slight decrease in the level of non-compliance from 1998 to 1999 may be as a result of some money being returned to MOE operations as the annual operating expenditures indicate (see Graph 2).<sup>2</sup> From 1993-94 to 1998-99 the MOE's operating expenditures were slashed by over 45%, from \$390 million to \$142 million. Since 1998, the MOE has seen

<sup>2</sup> Compiled from the budget information available on the Ontario Ministry of Finance web site <[www.gov.on.ca/FIN/english/budeng.htm](http://www.gov.on.ca/FIN/english/budeng.htm)> and the report titled *Ontario's Environment and the Common Sense Revolution: A Fifth Year Report* by the Canadian Institute for Environmental Law and Policy (CIELAP).



slight increases in operating expenditures/budgets each year, however the 2000-01 levels are still less than half of the amount the Ministry was allocated to protect Ontario's environment during the early 1990's.

**Graph 2: Ontario Ministry of Environment Operating Budget 1993-2001**



Comparing the two graphs it is worth noting that non-compliance has generally increased as the MOE operating budget has decreased.

### The Filthiest Four Violators

The top four violators in the province of Ontario in 1999 were **Chinook Group Limited, Stepan Company, Praxair** and **Ontario Power Generation**. For the second consecutive year, Chinook Group Limited and Stepan Company, both companies that manufacture organic chemicals, had the greatest number of violations of Ontario's wastewater discharge limits. Chinook Group Limited is situated in Sombra (near Sarnia) and violated Ontario's wastewater discharge limits 557 times. Stepan Company is situated in Longford Mills near Orillia and violated Ontario's wastewater limits 537 times. Neither company has been prosecuted for these violations.

With four violating facilities, the American based Praxair had the third largest number of violations in Ontario in 1999 totalling 228. Ontario Power Generation with its eight facilities violating Ontario's wastewater discharge limits 187 times in 1999 was the fourth largest violator.

## ***Chinook Group Limited***

Chinook Group Limited has been the number one violator for two years running and appears to have been at it again in 2000. Program Approvals issued by the MOE had protected Chinook Group Limited from prosecution for their 1998-wastewater discharge violations. Under a 'program approval' the company is given time to study the problem and come gradually into compliance while offering the company protection from prosecution for their non-compliance. Chinook was first issued a program approval in April of 1998. The time limit of that program approval was extended twice by the MOE to an expiry date of July 31, 2000.

Documents obtained by Sierra Legal through FOI requests revealed that MOE officials had worked through Christmas and New Year's Eve in 1998 to complete the paper work required to extend Chinook's Program Approval, which was to expire January 1, 1999. Documents obtained also revealed that MOE officials were concerned for the company's liability during the 30-day public comment period during which the company would not be protected from prosecution as the following quote from one MOE memo reveals: "Alternatively, is there some mechanism to give the company protection from prosecution while the [program approval] is on the [*Environmental Bill of Rights* registry website]?"

Chinook is a privately held company that has been in trouble with the law over their participation in an international cartel that fixed the price of vitamin additives used in animal feed. Chinook plead guilty to charges under the Competition Act and was fined 2.25 million dollars and a former officer of Chinook was sentenced to a nine-month jail term served in the community and was ordered to perform 50 hours of community service.<sup>3</sup> Chinook presently faces similar charges in the United States.

## ***Stepan Company***

Stepan Company is creating problems in the Ontario communities of Longford Mills and Rama, which are located on the shores of Lake St. John. Stepan discharges its wastewater directly into Lake St. John and local residents, including the Rama First Nation Community, are complaining that the lake has become overrun with weeds. Stepan produces surfactants, soap additives and cleaning agents and has exceeded phosphorus and nitrogen discharge limits on many occasions. Both phosphorus and nitrogen are nutrients that cause excessive plant growth.

Stepan Company is an American based company that had sales totalling almost 700 million dollars in year 2000. Stepan has several facilities around the world and trades on the New York and Chicago Stock Exchange under the symbol SCL.

Stepan also has a spotty international reputation and in Mexico has been accused of dumping its toxic wastewater into open ditches that run through the centre of a rural town. According to the film "Stepan Chemical Poisoning Mexican Communities," the open ditches Stepan is using to get rid of their waste are where the town's children play and residents wash their clothes.

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<sup>3</sup> Details can be found on the Government of Canada Competition Bureau web site:  
<<http://strategis.ic.gc.ca/SSG/ct01250e.html>>

## ***Praxair***

With violating facilities in Sarnia, Sault Ste. Marie, Maitland and Mooretown, the American based Praxair had the third largest number of violations in Ontario in 1999 totalling 228. Praxair is a 5 billion dollar inorganic chemical manufacturing company that produces industrial gases, surface coatings and polishing products. Praxair operates in 40 countries and had an operating profit of over 800 million dollars in 2000. Praxair is a public company trading under the symbol PX on the New York Stock Exchange.

## ***Ontario Power Generation***

In 1999, Ontario Power Generation (OPG) had eight facilities violating Ontario's wastewater discharge limits: Pickering, Darlington and Bruce Nuclear Generating Stations and Lambton, Nanticoke, Atikokan, Lakeview and Thunder Bay Thermal Generating Stations. These eight facilities violated Ontario's wastewater discharge limits 187 times in 1999. As described in a later section, discharges from two nuclear generating stations were by far the most lethal in Ontario, failing acute lethality tests 77 times during 1999.

The Ontario government wholly owns Ontario Power Generation (Bruce Nuclear is presently being leased to British Nuclear; however in 1999 Bruce was still operated by OPG).

## **Top Ten Violating Facilities from 1992 to 1999**

By summing eight years of non-compliance data, Sierra Legal determined the total number of wastewater discharge violations for each facility from 1992 to 1999. The following table summarizes the top ten violators.

**Table 1: Top Ten Violators 1992 - 1999**

<b>Facility</b>	<b>Location</b>	<b>Total Violations 1992 - 1999</b>
Chinook	Sombra	1189
Stepan Company Canada	Longford Mills	879
Haley Industries	Haley	673
Domtar Inc., Remediation Group	Trenton	591
OPG Pickering Nuclear Generating Station	Pickering	418
Kosa (formerly Celanese Canada Inc.)	Millhaven	338
Cytec Canada	Niagara Falls	330
Ford Motor Company	St. Thomas	206
OPG Lakeview Thermal Generating Station	Mississauga	193
ICI Canada Inc.	Cornwall	185

## Repeat Offenders

The following facilities have been found to be in non-compliance with Ontario's wastewater discharge limits for at least 5 years running. Our information indicates that none of these has been charged for its offences.

**Table 2: Facilities with Violations for at least 5 Consecutive Years**

<b>Facility</b>	<b>Location</b>	<b>Consecutive Years in Non-Compliance</b>
Cytec Canada	Niagara Falls	1992-2000
Domtar Inc., Remediation Group	Trenton	1992-2000
Haley Industries	Haley	1992-2000
McGarry Township WPCP	McGarry	1993-2000
Inco Whistle Mine	Sudbury	1993-2000
Petro Canada Oakville Refinery	Oakville	1992-1999
ICI Canada Inc.	Cornwall	1992-1999
Essroc Canada	Picton	1992-1999
Falconbridge Ltd., Kidd Metallurgical Division	Falconbridge	1994-2000
OPG Lambton Generating Station	Courtright	1994-2000
Ethyl Canada Inc.	Sarnia	1994-2000
Ford Motor Company	St. Thomas	1995-2000
Falconbridge Ltd., Kidd Mining Division	Falconbridge	1994-1999



## Toxic Violators

Most discharging facilities must conduct monthly 'acute lethality' tests, also referred to as toxicity tests. These tests are conducted by exposing aquatic animals to samples of wastewater under controlled conditions and measuring what percentage of the animals are killed. The two types of acute lethality tests used in Ontario use species named *Daphnia magna*, a water flea, and fingerling rainbow trout. Each test is conducted for a fixed duration; 48 hours for the *Daphnia magna* and 96 hours for the rainbow trout. The overall level of mortality is determined at the end of the test and if more than 50% of the test species die the test is considered a failure.

In 1999, both Pickering and Darlington nuclear generating stations had numerous acute lethality violations, as well as Inco's Port Colborne refinery and the Canadian Salt Company in Windsor. This means that discharges from these facilities were acutely lethal to aquatic organisms. The following table summarizes the dischargers with 5 or more acute lethality violations.

**Table 3: Facilities with at least 5 Acute Lethality Violations in 1999**

Facility	Location	Acutely Lethality to <i>Daphnia Magna</i>	Acutely Lethality to Rainbow Trout
Darlington Nuclear Power Generating Station	Bowmanville	25	33
Pickering Nuclear Power Generating Station	Pickering	8	11
Inco Port Colborne Refinery	Port Colborne	9	9
Canadian Salt Company (Ojibway Mine)	Windsor	9	9
Bruce Nuclear Power Generating Stations	Tiverton	9	6
Stepan Canada	Longford Mills	9	3
Inmet Mining	Schreiber	6	6
Gallaher (now closed)	Thorold	3	5
Atlas Speciality Steel	Welland	5	3
Pioneer Chemicals	Cornwall	6	0
Canadian Salt	Windsor	3	3
Timminco	Haley Station	2	3
Placer Dome Campbell Mine	Balmertown	3	2

*Note: Some facilities may have discharged from more than one control point resulting in multiple violations in the same month.*

## Pathogen Polluters

Pathogens commonly contained in wastewater include fecal coliform such as Escherichia Coliform (E. coli.), Cryptosporidium and Giardia. The current system of wastewater discharge monitoring typically requires facilities to test for total coliform, fecal coliform or E. coli. It was a strain of E. coli referred to as O157:H7 that was responsible for the deaths in the town of Walkerton in Ontario and Cryptosporidium that contaminated the drinking water in North Battleford, Saskatchewan. Typically the E. coli limit for municipal sewage treatment plant discharge is 200 counts per 100 millilitres of discharge. The following facilities released wastewater in 1999 containing E. coli. in excess of its permitted concentration.

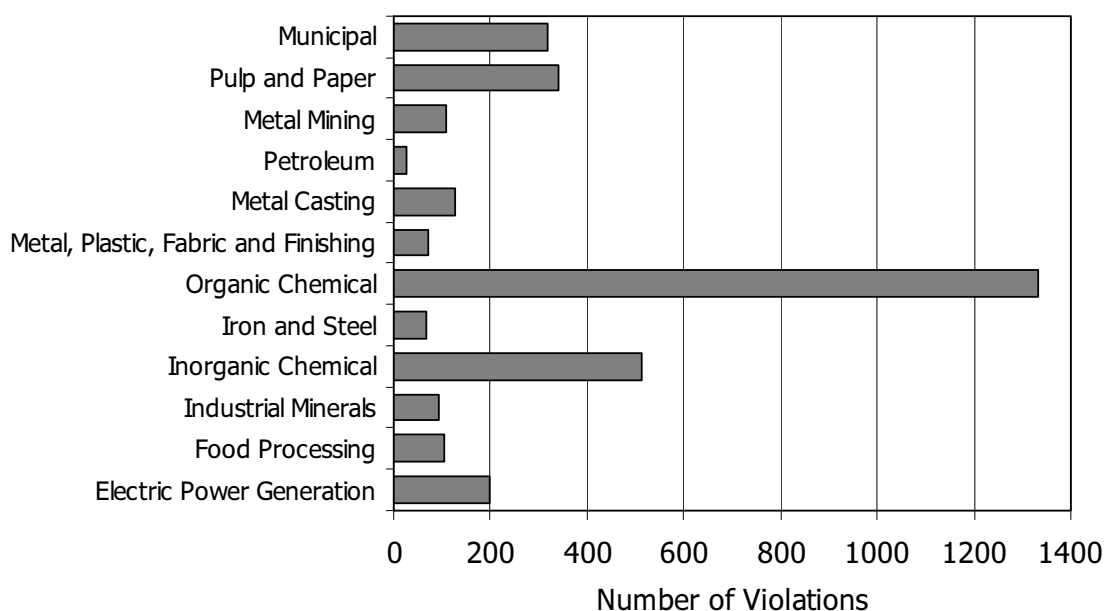
**Table 4: Facilities with Escherichia Coliform Violations in 1999**

Company	Location
OPG Lambton Thermal Generating Station	Courtright
Horizon Poultry	St. Mary's
Cold Spring Farms	Thamesford
Ford Motor Company	St. Thomas
Acton Water Pollution Control Plant	Acton

## Violations by Industrial Sector

For the second consecutive year the Organic Chemical Sector was the worst violator of Ontario's wastewater discharge laws, largely due to the top two violating companies, Chinook Group Limited and Stepan Company.

**Graph 3: 1999 Wastewater Violations by Industrial Sector**



## Ministry of the Environment's "Action" against Violators

This third annual report continues to demonstrate that many facilities are not responsive to the voluntary abatement strategies advocated by the provincial government. As a result, Ontario's waterways continue to be polluted year after year.

The MOE claims to be working with individual companies to bring about voluntary compliance. However, of the 50 facilities that violated provincial wastewater laws at least 10 times in 1999, 15 of these facilities had been violating the laws for at least 5 consecutive years prior to 1999. Despite this record of non-compliance, the MOE still did not charge any of these facilities in 1999.

One example of MOE's encouragement of voluntary abatement strategies is with the Domtar Inc., Remediation Group. The MOE reported in 1998 that Domtar was "implementing additional site remediation," and in 1999 indicated that a "voluntary abatement program was underway." However, the Domtar facility has been in non-compliance each year since 1992 and had 114 violations in 1999.

Similarly, Cytec Canada has been in non-compliance since 1992 and in 1998 the MOE reported that Cytec was implementing an environmental sensitivity study. In 1999 the MOE reported that an assessment had been completed and that no further studies were required. However, Cytec was again responsible for 140 violations in 1999. How is it that the MOE can believe that "no further action is required" if the facility is still in non-compliance?

Another strategy the MOE has used to manage facilities with wastewater problems is through issuing "Provincial Officer or Director's Orders," but too often these just require the facility to study the problem to determine the source without forcing them to fix the problem in a timely manner.

Even worse than the Ministry's voluntary abatement strategies is the issuance of "Program Approvals", which more or less sanction the non-compliance by offering the facility immunity from prosecution for exceeding the wastewater discharge limits while they "study the problem". Program approvals were infrequently used prior to the election of the present government. They are now used often. We found that the Ministry's non-compliance report does not report many of the facilities discharging wastewater under a program approval. One example is of Chinook Group Limited, the number one violator of wastewater discharge limits in 1999 and 1998; Chinook was not mentioned in the MOE 1999 non-compliance report. We assume this is because the Ministry, or at least some district offices of the Ministry, do not consider violating facilities operating under program approvals to be in non-compliance since a program approval protects the company from prosecution for their wastewater discharge violations.

In the past decade there has also been a litany of research showing that voluntary abatement methods are less effective than enforcement action. One survey assessed

corporate behaviour when financial cost is weighted against environmental harm.<sup>4</sup> The results indicate: "prosecution has a strong, statistically significant impact upon the environmental behaviour and in predictions of future behaviour." Executive Resources Group reported on a similar survey conducted by KPMG in a paper prepared for the MOE. The paper, titled *Environmental Compliance Assurance: A Review of Best International Practices*<sup>5</sup> assessed the reasons companies implement best environmental practices. The most important reason reported was the "legal duty to comply with regulations, followed by potential for Board of Directors liability".

This research and continued public pressure calling for more responsible enforcement of polluters appears to be getting through to the Government of Ontario. In the last few months the MOE does appear to be more committed to enforcement and has recently laid charges against Stelco, CGC Inc., and Norton Advanced Ceramics for various wastewater discharge offences. Furthermore, there has also been a reported increase in total fines and charges for all types of environmental offences in 2001.<sup>6</sup> We hope that the Government of Ontario has finally come to the realization that the only way to bring some polluters into compliance is by the use of legal actions. Despite these small steps towards improved enforcement, the Ontario government has a long way to go to bring compliance levels up sufficiently to protect our water.

## Living Downstream

Recent tragedies in Walkerton, Ontario and North Battleford, Saskatchewan have brought the quality of our drinking water to the forefront of public concern. Water is the lifeblood of the environment and is essential to the survival of all living things. Yet we continue to have problems with the water we drink because we have not protected it from the contaminants produced by industry and government.

Receiving waters polluted by wastewater discharges are potential sources of drinking water to communities and individuals living downstream. Downstream communities have little or no control over the quality of the water entering their jurisdiction but must pay the cost to treat the water such that it is fit for human consumption. Tougher regulation and enforcement of wastewater discharges would better protect downstream users of the water and save consumers millions of dollars in treatment costs (which consumers are paying for through water fees and taxes).

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<sup>4</sup> Dianne Saxe, 1990. The Impact of Prosecution of Corporations and Their Officers and Directors upon Regulatory Compliance by Corporations. *Journal of Environmental Law & Practice*, 91

<sup>5</sup> Executive Resources Group. 2000. *Environmental Compliance Assurance: A Review of Best Practices*. In: *Managing the Environment: A Review of Best Practices*.

<sup>6</sup> The MOE in a press release dated August 31, 2001 reported that in the first half of 2001 environmental fines are up 1 million dollars to \$1.869 million compared to \$858,605 in 2000 and environmental charges were up from 675 in 2000 to 825 in 2001.



## What You Can Do

This report provides investment information for many publicly held companies. We encourage citizens concerned about these violations and the effects they have on our shared water resources to check their portfolios, including the holdings of their mutual funds, to determine if they are investing in one of the companies discussed in this report. We also encourage concerned citizens to phone, fax or write the company and express your concern and ask that they “clean up their act.” Similarly, if you are an investor you can let them know whether you would invest in their company given their non-compliance record. If you can, go all the way to the top with your message.

We have also provided information on contacting local MOE district offices. If you are concerned about these polluters, you can telephone the MOE district office shown in the table and speak to the district manager and tell him or her how you feel. You can ask them to get tough with these polluters and prosecute them for their violations. You can point out that in many cases years of abatement measures have proven ineffective.

## CENTRAL REGION



### Central Region Violating Facilities

1. Ontario Power Generation – Darlington Nuclear Power Generating Station
2. Ontario Power Generation – Pickering Nuclear Power Generating Station
3. Petro Canada – Lubricants Centre

Central Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/Contact Info
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<p>Darlington Nuclear Generating Station</p> <p>Electricity Generator</p> <p>Ontario Power Generation Darlington NGS P.O. Box 4000 Bowmanville Ontario L1C 3Z8</p>	<ul style="list-style-type: none"> <li>Exceeded toxicity limit 58 times.</li> <li>Exceeded daily residual suspended particulate (RSP) limit twice and monthly RSP limit once.</li> <li>Exceeded monthly biological oxygen demand (BOD) limit once.<sup>7</sup></li> </ul>	<p>2000 - Yes</p> <p>1999 - 62</p> <p>1998 – 19</p> <p>1994 - continuous exceedance<sup>8</sup></p>	<p>Owned and Operated by Ontario Power Generation – which is owned by the government of Ontario</p>	<p>William Farlinger President and CEO</p> <p>Ron Osborne Executive Vice President</p> <p>Chief Nuclear Office Gene Preston 700 University Avenue Toronto ON M5G 1X6</p> <p>General inquiries of Ontario Power Generation should be directed to (416) 592-2555 or 1-877-592-2555 Fax: (416) 592-2178</p>	<p>2000 - Voluntary abatement program</p> <p>1999 - No action indicated</p> <p>1998 - Occurrence reviewed (Darlington)</p> <p>Ministry of the Environment York-Durham District Office Ph: (905) 427-5600 Fx: (905) 427-5602</p>
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<sup>7</sup> Missing large number of individual test results. Intermittent reporting of daily results.

<sup>8</sup> Exceedance of a policy or guideline.

Central Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/Contact Info
<p>Pickering Nuclear Generating Station</p> <p>Electricity Generator</p> <p>Ontario Power Generation Pickering NGS P.O. Box 160 1675 Montgomery Park Road Pickering L1V 2R5</p>	<ul style="list-style-type: none"> <li>Exceeded toxicity limits 12 times.</li> <li>Exceeded daily RSP limit 11 times.</li> <li>Exceeded daily pH limit 4 times.</li> </ul>	<p>2000- Yes 1999 - 27 1998 – 20 1994 – 181<sup>9</sup> 1993 - 47 1992 - 24</p>	<p>Owned and Operated by Ontario Power Generation – which is owned by the government of Ontario</p>	<p>William Farlinger President and CEO</p> <p>Ron Osborne Executive Vice President</p> <p>Chief Nuclear Office Gene Preston 700 University Avenue Toronto ON M5G 1X6</p> <p>General inquiries of Ontario Power Generation should be directed to (416) 592-2555 or 1-877-592-2555 Fax: (416) 592-2178</p>	<p>2000 - Voluntary abatement program</p> <p>1998 - Revised operational process</p> <p>Ministry of the Environment York-Durham District Office Ph: (905) 427-5600 Fx: (905) 427-5602</p>

<sup>9</sup> Exceedance of a policy objective or guideline.

Central Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/Contact Info
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Petro-Canada Petroleum Refinery Petro Canada - Lubricants Centre 385 Southdown Rd. Mississauga Ontario L5J 2Y3	<ul style="list-style-type: none"> <li>Exceeded daily volatile suspended solids (VSS) limit once.</li> <li>Exceeded daily phenolics limit 6 times and monthly phenolics limit once.</li> <li>Exceeded daily dissolved organic carbon (DOC) limit twice and monthly DOC limit once.<sup>10</sup></li> </ul>	2000 - Yes 1999 - 11 1998 - 15 <sup>11</sup> 1997 - 24 1996 - 44 <sup>10</sup> 1992 - 1 <sup>10</sup>	Trades on the Toronto Stock Exchange (TSE) under the symbol PCA	Ron A. Brenneman President and Chief Executive Officer Petro-Canada head office P.O. Box 2844 Calgary, Alta. T2P 3E3 Street address 150 - 6th Avenue S.W. Calgary, Alberta Tel: (403) 296-8000 Fax: (403) 296-3030 Ontario Regional Office Petro-Canada 3275 Rebecca St. Oakville, ON L6L 6N5 Tel: (905) 847-4100 Fax: (905) 469-3600	2000 - Voluntary abatement program underway/under investigation 1999 - No action given 1998 - Undertaking study/ revised operational process MOE Halton-Peel District Office 1-800-335-5906 Ph: (905) 319-3847 Fx: (905) 319-9902
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<sup>10</sup> No chlorine results reported. MOE report shows violation.

<sup>11</sup> Exceedance of a policy objective or guideline

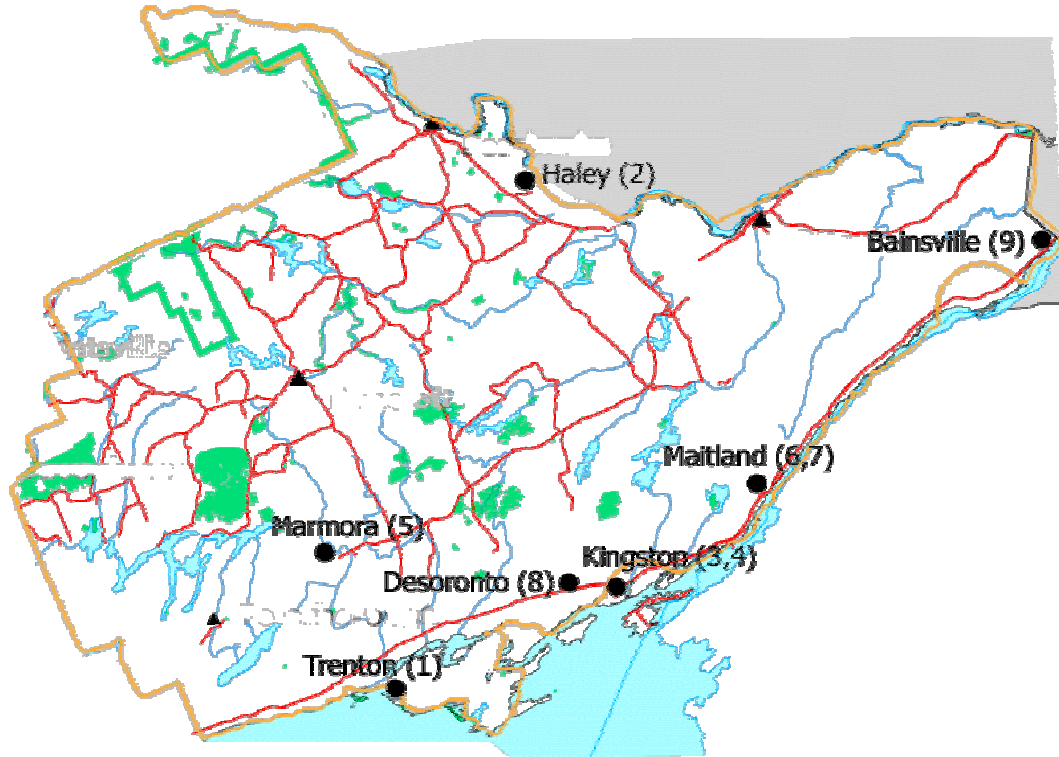
## SUMMARY - Central Region Violating Facilities

Total violations by 6 industrial facilities that violated less than 10 times each in 1999	15
Total violations by 3 industrial facilities that violated more than 10 times each in 1999.	110
Total violations in central region by industry	<b>125</b>

Total violations by 4 municipal facilities that violated less than 10 times each in 1999	18
Total violations by municipal facilities that violated more than 10 times each in 1999.	0
Total violations in central region by municipalities	<b>18</b>

Total violations in central region in 1999	<b>143</b>
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## EASTERN REGION



### Eastern Region Violating Facilities

1. Domtar Inc. Remediation Group
2. Haley Industries
3. Kosa Canada Ltd. (formerly Celanese Canada Inc.)
4. DuPont Canada Inc.
5. Canadian Talc Ltd. – Henderson Mine
6. Praxair Canada Inc.
7. Nitrochem Corp.(formerly Hydro Agri Canada)
8. Deseronto Water Pollution Control Plant
9. Creg Quay Limited

Eastern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Domtar Inc., Remediation Group</p> <p>Pulp and Paper Producer</p> <p>Domtar Inc., Remediation Group P.O. Box 460 Trenton, Ontario K8V 5R6</p>	<ul style="list-style-type: none"> <li>Exceeded the 20 day rolling average total suspended solids limit 62 times and the daily total suspended solids average 10 times.</li> <li>Exceeded the monthly solvent extractable limit 36 times and the daily limit 6 times.</li> </ul>	<p>2000 - Yes 1999 - 114 1998 - 251 1997 - 88 1996 - 15 1995 - 21 1994 - 30 1993 - 44 1992 - 28</p>	<p>Domtar Inc. trades on the New York Stock Exchange (NYSE) and the TSE under the symbol DTC</p>	<p>Raymond Royer President and Chief Executive Officer</p> <p>Guy L. Boucher Vice-President Environment</p> <p>395 de Maisonneuve Blvd. West Montréal (Québec) H3A 1L6 Tel. (514) 848-5400</p> <p>Mailing Address P.O. Box 7210 Station "A" Montréal (Québec) H3C 3M1</p>	<p>2000 – No charges laid/voluntary abatement program underway.</p> <p>1999 - Voluntary abatement program underway.</p> <p>1998 – Facility implementing additional site remediation</p> <p>Ministry of the Environment Belleville Area Office 1-800-860-2763 Tel: (613) 962-9208 Fax: (613) 962-6809</p>



Eastern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Haley Industries Haley Station</p> <p>Metal Casting</p> <p>Haley Industries 634 Magnesium Rd. Haley, Ontario K0J 1Y0</p>	<ul style="list-style-type: none"> <li>• Exceeded daily residual suspended particulates (RSP) limit 62 times and monthly limit 7 times.</li> <li>• Exceeded daily phosphorous limit 5 times and monthly limit 3 times.</li> <li>• Exceeded daily BOD limit 14 times and monthly limit 6 times.</li> <li>• Exceeded daily copper limit twice and monthly limit twice.</li> <li>• Exceeded monthly aluminium limit twice.</li> <li>• Exceeded daily silver limit 3 times and monthly limit twice.</li> </ul>	<p>2000 - Yes</p> <p>1999 - 108</p> <p>1998 - 121</p> <p>1997 - 22</p> <p>1996 - 16</p> <p>1995 - 38</p> <p>1994 - 55</p> <p>1993 - 211</p> <p>1992 - 102</p>	<p>Trades on the TSE under the symbol HLY</p>	<p>Derrick Bartram President and Chief Executive Officer General Number (613) 432-8841</p>	<p>2000 - Provincial officer's order issued</p> <p>1999 -Field order issued</p> <p>1998 - Abatement program underway</p> <p>Ministry of the Environment Ottawa District Office 1-800-860-2195 Tel: (613) 521-3450 Fax: (613) 521-5437</p>

Eastern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>KoSa (formerly Celanese Canada Inc.) Millhaven</p> <p>Organic Chemical Manufacturer</p> <p>KoSa Canada Co. P.O. Box 2800, Highway 33 Kingston, Ontario K7L 4Z8</p>	<ul style="list-style-type: none"> <li>• Exceeded daily RSP limit 24 times and monthly RSP limit 4 times.</li> <li>• Exceeded daily pH limit 51 times.<sup>12</sup></li> <li>• Exceeded monthly phenolics limits once.</li> <li>• Exceeded daily DOC limit twice.</li> <li>• Exceeded daily nitrogen limit twice.</li> </ul>	<p>2000-Yes 1999 - 84 1998 - 233 1997 - 5 1996 - 16</p>	<p>KoSa is 50% owned by Koch Industries (Private held) and IMASAB, SA de CV, a company owned by Isaac Saba IMASAB, SA de CV trades on the NYSE under the symbol – SAB</p>	<p>Chairman of the Board and Chief Executive Officer of Koch Industries, Charles Koch</p> <p>Tel: (613) 389-2210 Fax: (613) 389-6281</p> <p>Bill Every, Site Manager General Number (613) 389-2210</p>	<p>2000 – Assessment complete no further action required.</p> <p>1999 – Issued a Program Approval</p> <p>1998 – Program Approval issued/facility is reassessing operational process</p> <p>MOE Kingston Regional Office 1-800-267-0974 Tel: (613) 549-4000 Fax: (613) 548-6908</p>

<sup>12</sup> 49 of the pH violations are from an internal control point.

Eastern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>DuPont Canada Maitland Facility</p> <p>Organic Chemical Manufacturer</p> <p>DuPont Canada Inc. Kingston Site P.O. Box 2100 Kingston, Ontario K7L 4Z6</p>	<ul style="list-style-type: none"> <li>• Solids limit 3 times and daily limit 9 times</li> <li>• Exceeded monthly phosphorous limit 7 times and the daily limit once.</li> <li>• Exceeded monthly ammonium limit and daily pH once.</li> <li>• Exceeded monthly copper and vanadium limits 9 times.</li> <li>• Exceeded monthly phenolics and cobalt limit twice.</li> <li>• Exceeded monthly DOC limit 10 times.</li> <li>• Exceeded monthly nitrogen limit 5 times and the nitrates level 5 times.</li> <li>• Exceeded the monthly Total Kjeldahl Nitrogen (TKN) limit once and the daily limit 4 times.</li> </ul>	<p>2000 - Yes 1999 - 69 1996 - 3 1995 - 1<sup>13</sup></p>	<p>Toronto Stock Exchange and trade under the symbol DUP.A.</p>	<p>Dave W. Colcleugh Chairman, President and Chief Executive Officer</p> <p>Jennifer Hooper Director, Safety, Health, Energy and Environment</p> <p>DuPont Canada Inc. Box 2200, Streetsville Mississauga, Ontario L5M 2H3</p> <p>For general inquiries, phone (905) 821-3300 For corporate information, contact Public Affairs at (905) 821-5679, Fax (905) 821-5653.</p>	<p>2000 - Under investigation/voluntary abatement program underway</p> <p>1999 - Assessment complete non further action</p> <p>Ministry of the Environment Kingston Regional Office Toll free:1-800-267-0974 Tel: (613) 549-4000 Fax: (613) 548-6908</p>

<sup>13</sup> Exceedance of policy objective or guideline.

Eastern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Canada Talc Henderson Mine</p> <p>Industrial Minerals Manufacturer</p> <p>Canada Talc Limited Henderson Mine P.O. Box 537 Marmora Mine Rd. Marmora, Ontario K0K 2M0</p>	<ul style="list-style-type: none"> <li>Exceeded weekly RSP limit 24 times and monthly RSP limit 9 times.</li> </ul>	<p>2000 - Yes 1999 - 33 1998 - 28 1997 - 2</p>	<p>Owned by Highwood Resources Ltd.</p> <p>Trades on the TSE under the symbol HWD</p>	<p>James W. Roxburg Chairman and Chief Executive roxburg@dynatech.com</p> <p>Garry W. Lynkowski President &amp; Chief Financial Officer garryl@telusplanet.net</p> <p>Head Office Suite 715-734 7th Ave S.W. Calgary, AB T2P 3P8 Tel: (403) 261-3999 Fax: (403) 264-2959</p>	<p>2000 - Voluntary abatement program underway</p> <p>1999 - Voluntary abatement Program</p> <p>1998 - Facility investigating new operational process</p> <p>MOE Belleville Area Office 1-800-860-2763 Tel: (613) 962-9208 Fax: (613) 962-6809</p>
<p>Praxair</p> <p>Inorganic Chemical Manufacturer</p> <p>Praxair Canada Inc. (Maitland Site) 1336 Highway 2 Maitland, Ontario K0E 1P0</p>	<ul style="list-style-type: none"> <li>Exceeded daily RSP limit once.</li> <li>Exceeded daily pH limit 19 times.</li> <li>Exceeded daily nitrates limit 7 times.</li> </ul>	<p>1999 - 27</p>	<p>Trades on the NYSE under the symbol PX</p>	<p>Dennis H. Reilley, Chairman and CEO Praxair Canada, Inc. Corporate Communications Praxair Inc. 39 Old Ridgebury Road Danbury CT 06810-5113</p>	<p>1999 – Not reported on by MOE</p> <p>Ministry of the Environment Kingston Regional Office Toll free:1-800-267-0974 Tel: (613) 549-4000 Fax: (613) 548-6908</p>

Eastern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
Praxair continued				Canadian Head Office 1 City Centre Drive, Suite 1200 Mississauga Ontario L5B 1M2  Tel: (905) 803-1600 Fax: (905) 803-1690 1-800-PRAXAIR U.S. Telephone No. 716.879.4077 e-mail: info@praxair.com	
Nitrochem Corp. (formerly Hydro-Agri Canada) Inorganic Chemical Manufacturer  Nitrochem Corp. (formerly Hydro Agri Canada) P.O. Box 681 Maitland, Ontario K0E 1P0	<ul style="list-style-type: none"> <li>Exceeded toxicity limit 4 times.</li> <li>Exceeded daily RSP limit 3 times.</li> <li>Exceeded daily ammonium limit once.</li> <li>Exceeded daily nitrates limit twice and monthly nitrates limit six times.</li> </ul>	2000 - Yes 1999 - 16 1998 - 49 1997 - 20 <sup>14</sup> 1996 - 33 1995 - 22 <sup>13</sup> 1994 - 12 <sup>13</sup> 1993 - 2 <sup>13</sup>	Owned in 1999 by a Norwegian Company Norsk Hydro.  Trades on stock markets all over the world including the NYSE under the symbol NHY.	February, 2000 sold to Nitrochem Corp, a newly established company owned by Dafina Holdings Limited, Brinc Inc., Baldev Limited and MG Partners. No contact info available.	2000 - Assessment complete no further action  1999 - Assessment complete no further action  1998 - Program Approval issued  Kingston Regional Office of MOE  Toll free:1-800-267-0974 Tel: (613) 549-4000 Fax: (613) 548-6908

<sup>14</sup> Exceedance of policy objective or guideline.

Eastern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Contact information	MOE Action/ Contact Info
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<p>Deseronto WPCP Municipal Sewage Treatment P.O. Box 310, 331 Main Street Deseronto, Ontario K0K 1X0</p>	<ul style="list-style-type: none"> <li>Exceeded monthly phosphorus concentration seven times.</li> <li>Exceeded monthly phosphorus loadings four times.</li> </ul>	<p>1999 - 11 1998 - 4</p>	<p>Deseronto WPCP P.O. Box 310, 331 Main Street Deseronto, Ontario K0K 1X0</p>	<p>1999 – Certificate of Approval being developed  Ministry of the Environment Belleville Area Office Tel: (613) 962-9208 Fax: (613) 962-6809</p>
<p>Creg Quay Limited Municipal Sewage Treatment  Creg Quay Limited, P.O.Box 160, 21236 South Service Road Bainsville, Ontario K0C 1E0</p>	<ul style="list-style-type: none"> <li>Exceeded monthly average total phosphorus concentration 10 times.</li> </ul>	<p>2000 - Yes 1999 - 11</p>	<p>Creg Quay Limited 21236 South Service Rd Bainsville, On K0C 1E0 (613) 347-2705</p>	<p>2000 – Assessment complete no further action required  1999 - Assessment complete no further action.  Ministry of the Environment Cornwall Area Office Tel: (613) 933-7402 Fax: (613) 933-6402</p>

## SUMMARY: Eastern Region Violating Facilities

Total violations by 10 industrial facilities that violated less than 10 times each in 1999.	34
Total violations by 7 industrial facilities that violated more than 10 times each in 1999.	451
Total violations in eastern region by industry	<b>485</b>

Total violations by 8 municipal facilities that violated less than 10 times each in 1999.	54
Total violations by 2 municipal facilities that violated more than 10 time each in 1999.	22
Total violations in eastern region by municipalities.	<b>76</b>

Total violations in eastern region	<b>561</b>
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## SOUTH-WESTERN REGION



### South-western Region Violating Facilities

1. Chinook Group Ltd.
2. Stepan Chemical Canada
3. Praxair Canada Inc. – Mooretown
4. Praxair Canada Inc. – Sarnia
5. Ethyl Canada Inc.
6. Ford Motor Company – St. Thomas
7. Ford Motor Company – Windsor
8. Cabot Canada
9. Ontario Power Generation – Bruce Nuclear Generating Station
10. Canadian Salt Company Ltd.
11. Ontario Power Generation – Lambton Generating Station
12. Omstead Foods Ltd.
13. Bayer Inc.
14. Alliston Regional Plant
15. Warton Lagoon
16. Pottersburg Water Pollution Control Plant
17. Lucknow Sewage Treatment Facility



Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Chinook Group Limited</p> <p>Organic Chemical Manufacturer</p> <p>Chinook Group Ltd Sombra, ON NOP 2H0</p>	<ul style="list-style-type: none"> <li>Exceeded toxicity limit 3 times.</li> <li>Exceeded daily RSP limit 100 times and monthly limit 9 times.</li> <li>Exceeded daily solvent extractable (oil and grease) limit 5 times and monthly limit 9 times.</li> <li>Exceeded daily phosphorous limit 3 times and monthly limit 7 times.<sup>14</sup></li> <li>Exceeded daily zinc limit once.</li> <li>Exceeded daily ammonium limit 15 times and monthly limit 6 times.<sup>15</sup></li> <li>Exceeded daily DOC limit 210 times and monthly limit 9 times.</li> <li>Exceeded daily nitrogen limit 171 times and monthly nitrogen limit 9 times.</li> </ul>	<p>2000 - Yes 1999 - 557 1998 - 630 1995 - 1<sup>16</sup> 1994 - 1</p>	<p>Privately owned</p>	<p>Chinook Group Ltd. Sombra, ON NOP 2H0 (519) 892-3411</p> <p>Head Office Chinook Group Ltd. PO Box 118 Commerce Court North Toronto, ON M5L 1E2 Tel: (416) 363-6045 Fax: (416) 363-6339</p>	<p>2000 - Program approval and voluntary abatement program</p> <p>1999 - No information available on MOE web site</p> <p>1998 – Program Approval issued</p> <p>Ministry of the Environment Sarnia District Office 1094 London Rd. Sarnia ON N7S 1P1 1-800-387-7784 Tel: (519) 336-4030 Fax: (519) 336-4280</p>

<sup>15</sup> Some ammonia and phosphorus daily data has not been reported.

<sup>16</sup> Exceedance of policy objective or guideline.

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Stepan Chemical Longford Mills</p> <p>Organic Chemical Manufacturer</p> <p>Stepan Canada Longford Mills, Ontario LOK 1L0</p>	<ul style="list-style-type: none"> <li>Exceeded toxicity limit 12 times.</li> <li>Exceeded daily RSP limit 70 times and monthly limit 7 times.</li> <li>Exceeded daily solvent extractable limit 35 times and monthly solvent extractable limit 11 times.<sup>16</sup></li> <li>Exceeded daily phosphorous limit 15 times and monthly phosphorous limit 11 times.<sup>17</sup></li> <li>Exceeded daily DOC limit 321 times and monthly DOC limit 9 times.</li> <li>Exceeded daily nitrogen limit 37 times and monthly nitrogen limit 9 times.</li> </ul>	<p>2000 - Yes</p> <p>1999 - 537</p> <p>1998 - 338</p> <p>1994 - 2</p> <p>1992 - 2</p>	<p>Trades on the NYSE and Chicago Stock Exchange under the symbol SCL</p>	<p>F. Quinn Stepan Chairman and Chief Executive Officer</p> <p>Walter J. Klein Vice President Finance</p> <p>Tel: (847) 501-2340 Fax: (847) 446-2843 Email: wklein@stepan.com</p> <p>Andy Hallett General Manager of Sales and Marketing in Canada</p>	<p>2000 – Director’s control order Issued</p> <p>1999 – Control order issued</p> <p>1998 – Facility undertaking study/improvement to treatment works</p> <p>Ministry of the Environment Barrie District Office 54 Cedar Pointe Dr. Unit 1203 Barrie ON L4N 5R7 1-800-890-8511 Tel: (705) 739-6441 Fax: (705) 739-6440</p>

<sup>17</sup> Some phosphorus and solvent extractable data only reported weekly; should be daily.

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Praxair Mooretown</p> <p>Inorganic Chemical Manufacturer</p>	<ul style="list-style-type: none"> <li>Exceeded daily pH limit 83 times.<sup>18</sup></li> </ul>	<p>2000 - Yes 1999 -83</p>	<p>Trades on the New York Stock Exchange under the symbol PX.</p>	<p>Dennis H. Reilley, Chairman and CEO Praxair Canada, Inc.</p> <p>Corporate Communications Praxair, Inc. 39 Old Ridgebury Road Danbury, CT 06810-5113</p> <p>800-PRAXAIR Tel:716.879.4077 e-mail: info@praxair.com</p> <p>Canadian Head Office 1 City Centre Drive, Suite 1200 Mississauga Ontario L5B 1M2 Tel: (905) 803-1600 Fax: (905) 803-1690</p>	<p>2000 - Assessment complete - no further action</p> <p>1999 - Ministry did not report on the Mooretown facility.</p> <p>Ministry of the Environment Sarnia District Office Toll free number: 1-800-387-7784 Tel: (519) 336-4030 Fax: (519) 336-4280</p>

<sup>18</sup> Missing data Jun. 30 - Dec. 31.

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Praxair Sarnia</p> <p>Inorganic Chemical Manufacturer</p> <p>Praxair Canada Inc. Sarnia Plant P.O. Box 2252, 915 Vidal St. S., Sarnia, Ontario N7T 7L7</p>	<ul style="list-style-type: none"> <li>Exceeded daily RSP limit 3 times and monthly RSP limit 3 times.</li> <li>Exceeded daily pH limit 46 times.</li> <li>Exceeded monthly phosphorous limit once.</li> <li>Exceeded daily zinc limit 9 times, weekly Zn limit 6 times and monthly Zn limit 6 times.</li> <li>Exceeded monthly DOC limit once.<sup>19</sup></li> </ul>	<p>2000 - Yes 1999 - 75 1998 - 41 1993 - 2<sup>20</sup></p>	<p>Trades on the New York Stock Exchange under the symbol PX</p>	<p>Dennis H. Reilley, Chairman and CEO Praxair Canada, Inc.</p> <p>Corporate Communications Praxair, Inc. 39 Old Ridgebury Road Danbury, CT 06810-5113 800-PRAXAIR Tel: (716) 879-4077 e-mail: info@praxair.com</p> <p>Canadian Head Office 1 City Centre Drive, Suite 1200 Mississauga ON L5B 1M2 Tel: (905) 803-1600 Fax: (905) 803-1690</p>	<p>2000 - Assessment complete - no further action.</p> <p>1999 - Assessment complete - no further action.</p> <p>1998 - Revised Certificate of Approval for new production facility</p> <p>Ministry of the Environment Sarnia District Office Toll free number: 1-800-387-7784 Tel: (519) 336-4030 Fax: (519) 336-4280</p>

<sup>19</sup> Missing data Mar. 30 - Dec. 31.

<sup>20</sup> Exceedance of policy objective or guideline.

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Ethyl Canada Corunna Facility</p> <p>Organic Chemical Manufacturer</p> <p>Ethyl Canada Inc. 220 St. Clair Pkwy Corunna, ON N0N 1G0</p>	<ul style="list-style-type: none"> <li>Exceeded monthly RSP limit 12 times.</li> <li>Exceeded monthly solvent extractable limit 12 times.</li> <li>Exceeded monthly phenolics limit 12 times.</li> <li>Exceeded monthly DOC limit 12 times.<sup>21</sup></li> </ul>	<p>1999 - 48 1998 - 19 1997 - 1 1996 - 1 1995 - 4 1994 - 7 1993 - 2 1992 - 4<sup>22</sup></p>	<p>Ethyl Corp. trades on the New York Stock Exchange under the symbol EY</p>	<p>Ethyl Canada Inc. Corunna Facility General Number (519) 862-1411</p> <p>Ethyl Corporation, Investor Relations Tel: (804) 788-5555 e-mail: InvestorRelations@Ethyl.com</p> <p>David Wilson, President, Ethyl Canada</p> <p>Bruce C. Gottwald, Chairman</p> <p>Thomas E. Gottwald, Chief Executive Officer</p>	<p>1999 - Not reported on by MOE - granted a program approval in 1998.</p> <p>1998 - Revised operation/ Certificate of Approval for scrubber issued</p> <p>Ministry of the Environment Sarnia District Office Toll free number: 1-800-387-7784 Tel: (519) 336-4030 Fax: (519) 336-4280</p>

<sup>21</sup> Data provided for combined effluent not process effluent. Missing all daily data and complete data for 7 substances.

<sup>22</sup> Two exceedances of policy objective or guideline.

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Ford Motors St. Thomas Assembly Plant</p> <p>Ford Motor Co. (Talbotville) Box 2005 St. Thomas, Ontario N5P 3W1</p>	<ul style="list-style-type: none"> <li>• Exceeded daily RSP 47 times and monthly RSP limit six times</li> <li>• Exceeded daily pH limit five times</li> <li>• Exceeded daily phosphorus limit four times</li> <li>• Exceeded monthly BOD limit twice and daily BOD limit twice</li> <li>• Exceeded monthly phenol limit once.</li> <li>• Exceeded daily E. coli. limit four times.</li> </ul>	<p>1999 - 71 1998 - 45 1997 - 49 1996 - 30 1995 -11<sup>23</sup></p>	<p>Trades under the symbol F on the NYSE</p>	<p>Alain Batty, President and CEO, Ford Canada</p> <p>St. Thomas Assembly Plant Manager Ken Ward</p> <p>Ford Motor Company of Canada Limited The Canadian Road P.O. Box 2000 Oakville, Ontario, Canada L6J 5E4 1-800-565-FORD (3673)</p>	<p>2000 - Voluntary abatement program underway/ Program approval issued</p> <p>1999 - Voluntary abatement program underway</p> <p>1998 - Facility revised operational process</p> <p>Ministry of the Environment London Regional Office Toll free number from area code 519: 1-800-265-7672 Tel: (519) 873-5000 Fax: (519) 873-5020</p>

<sup>23</sup> Exceedance of policy objective or guideline.

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Ford Motors Windsor</p> <p>Metal Casting</p>	<ul style="list-style-type: none"> <li>Exceeded monthly RSP limit 9 times.</li> <li>Exceeded monthly DOC limit 9 times.<sup>24</sup></li> </ul>	<p>2000 - Yes 1999 - 18 1995 - 21<sup>25</sup> 1993 - 12<sup>24</sup> 1992 - 12<sup>24</sup></p>	<p>Trades under the symbol F on the NYSE</p>	<p>Mike de Irala, Ford's Windsor Site Operations Manager</p> <p>Ford Motor Company of Canada Limited P.O. Box 2000 Oakville, Ontario, Canada L6J 5E4 1-800-565-FORD</p>	<p>2000 - voluntary abatement program underway</p> <p>1999 - not mentioned in MOE report</p> <p>Ministry of the Environment Windsor Area Office 1-800-387-8826 Tel: (519) 254-2546 Fax: (519) 254-5894</p>
<p>Cabot Canada Inorganic Chemical Manufacturer</p> <p>Sarnia Plant Address: 800 Tashmoo Avenue Sarnia, Ontario Canada N7T 7N4</p>	<ul style="list-style-type: none"> <li>Exceeded daily RSP limit 20 times and monthly RSP limit twice.</li> <li>Exceeded daily pH limit once.</li> <li>Exceeded daily DOC limit 3 times and monthly DOC limit 3 times.</li> </ul>	<p>2000 - Yes 1999 - 29 1998 - 7</p>	<p>Cabot Corp. trades on the NYSE under the symbol CBT</p>	<p>Cabot Corporation Kennett F. Burnes Chairman and CEO John E. Anderson VP and Director of Safety, Health and Environmental Affairs Tel:(617) 342-6202 Fax:(617) 342-6018</p> <p>Sarnia Plant Tel: (519) 336-2261 Fax:(519) 336-8501</p>	<p>2000 - assessment complete – no further action required</p> <p>1999 - assessment complete no further action.</p> <p>1998 - one time occurrence/no remedial action required</p> <p>MOE Sarnia District 1-800-387-7784 Tel: (519) 336-4030 Fax: (519) 336-4280</p>

<sup>24</sup> Violations at alternate control point, not process effluent control point.

<sup>25</sup> Exceedance of policy objective or guideline.

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Ontario Power Generation Bruce Nuclear Generating Station</p> <p>Electric Power Generator</p> <p>Ontario Power Generation Inc. Bruce Nuclear A &amp; B P.O. Box 3000 (B06) Tiverton, Ontario N0G 2T0</p> <p>Ontario Power Generation Inc. Bruce Nuclear Bruce Bulk Steam Systems P.O. Box 1540 (B17) Tiverton, Ontario N0G 2T0</p>	<ul style="list-style-type: none"> <li>Exceeded toxicity limit 15 times.</li> <li>Exceeded daily RSP 6 times and monthly RSP limit twice.</li> <li>Exceeded daily pH limit once.</li> <li>Exceeded TRO once.</li> </ul>	<p>2000 - Yes 1999 - 25 1998 - 18 1996 - 2 1995 - 5 1994 - 24 1993 - 5 1992 - 4</p>	<p>In 1999 Bruce nuclear was still fully owned and operated by Ontario Power Generation (OPG).</p> <p>OPG is owned by the government of Ontario.</p> <p>Bruce NGS A and Bruce NGS B are presently leased to British Energy PLC. British Energy is listed on the London and NYSE trades under the symbol BGY.</p>	<p>William Farlinger President and CEO</p> <p>Ron Osborne Executive VP</p> <p>Gene Preston, Chief Nuclear Officer</p> <p>Address: 700 University Avenue, Toronto, ON M5G 1X6</p> <p>General inquiries of Ontario Power Generation should be directed to (416) 592-2555 or toll-free at 1-877-592-2555. Fax: (416) 592-2178</p>	<p>2000 - Assessment complete/no further action required (Steam Plant, NGS A, Development)/under investigation (Energy Centre)/Voluntary abatement program underway (Energy centre, Heavy Water Plant).</p> <p>1999 - No charges laid/voluntary abatement program underway</p> <p>1998 - Operation reviewed cause could not be determined (Bulk Steam Plant)/facility revised operational process (NGS A)/Developed a corrective action plan/ Program Approval issued (NGS B)</p> <p>MOE Owen Sound Area Office Toll free number from area code 519: 1-800-265-3783 Tel: (519) 371-2901 Fax: (519) 371-2905</p>



Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Canadian Salt Co. Ojibway Mine</p> <p>Industrial Minerals</p> <p>The Canadian Salt Company Limited Ojibway Mine Sandwich TWP., P.O. Box 7008 200 Morton Drive Windsor, Ontario N9C 3Y7</p>	<ul style="list-style-type: none"> <li>Exceeded monthly toxicity limit 18 times.</li> <li>Exceeded weekly RSP limit twice and monthly RSP limit once.<sup>26</sup></li> </ul>	<p>2000 - Yes 1999 - 21 1998 - 18</p> <p>1997 - 6 1995 - 3<sup>27</sup> 1994 - 1<sup>26</sup></p>	<p>Not known</p>	<p>Executive Office 755 Boulevard St-Jean, 7th Floor Pointe-Claire, Quebec H9R 5M9 saltmaster@windsor salt.com</p> <p>Guy L. Leblanc Vice-President, Production &amp; Administration Tel: (514) 630-0900 Fx: (514) 694-2451</p> <p>Salt Mine Address P.O. Box 7008, Sandwich 200 Morton Drive Windsor ON N9C 3Y7</p> <p>R.A. Ellis Mine Manager Tel: (519) 966-2142 Fx: (519) 972-1777</p>	<p>2000 - Voluntary abatement program underway</p> <p>1999 - Voluntary abatement program underway</p> <p>1998 - Abatement program established/under investigation.</p> <p>Ministry of the Environment Windsor Area Office Toll free number: 1-800-387-8826 Tel: (519) 254-2546 Fax: (519) 254-5894</p>

<sup>26</sup> Missing weekly data Oct. - Dec.

<sup>27</sup> Exceedance of policy objective or guideline.

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Lambton Thermal Generating Station</p> <p>Electric Power Generator</p> <p>Ontario Power Generation</p> <p>Lambton Thermal Generating Station P.O. Box 2100, 1886 St. Clair Parkway Courtright, ON N0N 1H0</p>	<ul style="list-style-type: none"> <li>Exceeded daily RSP limit eight times and monthly RSP limit three times.</li> <li>Exceeded temperature increase twice</li> <li>Exceeded daily E. coli. limit once.</li> </ul>	<p>2000 - Yes</p> <p>1999 - 14</p> <p>1998 - 4</p> <p>1997 - 12</p> <p>1996 - 10</p> <p>1995 - 3</p> <p>1994 - 2</p>	<p>Owned by Ontario Power Generation which in turn is owned by the Ontario Government</p>	<p>William Farlinger President and CEO</p> <p>Ron Osborne Executive VP</p> <p>700 University Avenue, Toronto, ON, M5G 1X6</p> <p>General inquiries of Ontario Power Generation should be directed to (416) 592-2555 or toll-free at 1-877-592-2555 Fax: (416) 592-2178</p>	<p>2000 - Assessment complete no further action/voluntary abatement program underway.</p> <p>1999 - Voluntary abatement program underway/ under investigation</p> <p>1998 - Certificate to Approval issued to alter lagoon operating procedure.</p> <p>MOE Sarnia District Office Tel: (519) 336-4030 Fax: (519) 336-4280</p>
<p>Omstead Foods</p> <p>Food Processing</p> <p>Omstead Foods Ltd. Box 520 303 Milo Rd. Wheatley ON N0P 2P0</p>	<ul style="list-style-type: none"> <li>Exceeded daily RSP limit 10 times and monthly RSP limit 3 times</li> </ul>	<p>1999 - 13</p> <p>1995 - 3</p> <p>1994 - 4</p> <p>1993 - 36<sup>28</sup></p> <p>1992 - 7<sup>27</sup></p>	<p>Family owned</p>	<p>John Omstead, President Tel: (519) 825-4673 Fax: (519) 825-3134, e-mail: johno@mnsi.net</p>	<p>1999- assessment complete no further action required</p> <p>MOE Windsor area office 1-800-387-8826 Tel: (519) 254-2546 Fax: (519) 254-5894</p>

<sup>28</sup> Exceedance of policy objective or guideline.

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/ Contact Info
<p>Bayer Inc. Sarnia Organic Chemicals Manufacturer Bayer Inc. P.O. Box 3001 1265 Vidal Street South Sarnia, Ontario N7T 7M2</p>	<ul style="list-style-type: none"> <li>Exceeded the daily RSP limit once</li> <li>Exceeded monthly average cobalt limit 8 times</li> <li>Exceeded TKN limit once</li> </ul>	<p>2000 - Yes 1999 – 10 1998 - 6</p>	<p>Trades on markets all over Europe including Frankfurt under BAYG.F and BAYGR and Xetra under the symbol BAYG.DE</p>	<p>Bayer is a large Germany-based multinational.  M. Manfred Schneider has been Chairman of the Board of Management of Bayer AG since April 29, 1992. No contact information available.  Sarnia Facility General Contact (519) 337-8251</p>	<p>2000 - Director's order being prepared/ Voluntary abatement program underway  1999 - No charges laid/Voluntary abatement program underway  1998 – Revised Program Approval  Ministry of the Environment Sarnia district office Toll free number: 1-800-387-7784 Tel: (519) 336-4030 Fax: (519) 336-4280</p>

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Contact information	MOE Action/ Contact Info
Alliston Regional Plant Municipal Sewage Treatment	<ul style="list-style-type: none"> <li>Exceeded monthly average total phosphorus concentration 12 times.</li> </ul>	1999 - 12	Alliston Regional Plant P.O. Box 910 10 Wellington St. East Alliston, Ontario L9R 1A1	1999 - Control order issued Ministry of the Environment  MOE Barrie District Office 54 Cedar Pointe Dr. Unit 1203 Barrie ON L4N 5R7 Toll free: 1-800-890-8511 Tel: (705) 739-6441 Fax: (705) 739-6440
Warton Lagoon Municipal Sewage Treatment	<ul style="list-style-type: none"> <li>Exceeded BOD concentration limit and loading six times</li> <li>Exceeded RSP concentration limit seven times and loading 8 times.</li> <li>Exceeded total phosphorus loading once</li> </ul>	2000 - Yes 1999 - 28	Warton Lagoon P.O. Box 760 Southampton, Ontario N0H 2L0	2000 - Assessment complete no further action required  1999 - Voluntary abatement program underway  MOE Owen Sound Area Office 1580-20th St. E. P.O. 967 Owen Sound ON N4K 6H6 1-800-265-3783 Tel: (519) 371-2901 Fax: (519) 371-2905
Pottersburg WPCP Municipal Sewage Treatment	<ul style="list-style-type: none"> <li>Exceeded RSP concentration limit once</li> <li>Exceeded total phosphorus concentration limit five times</li> </ul>	2000 - Yes 1999 - 40 <sup>29</sup> 1998 - 2 1997 - 2 1995 - 1 1994 - 1	Pottersburg WPCP City of London P.O. Box 5035, 300 Dufferin Ave. London, Ontario N6A 4Z9	2000 - Assessment complete no further action required  1999 - Assessment complete no further action required

<sup>29</sup> 34 exceedances are of policy objectives or guidelines.

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Contact information	MOE Action/ Contact Info
Pottersburg WPCP continued	<ul style="list-style-type: none"> <li>• Exceeded total phosphorus concentration guideline four times and loadings guidelines nine times</li> <li>• Failed to maintain sufficient dissolved oxygen guideline level five times</li> <li>• Exceeded RSP concentration guideline eight times</li> <li>• Exceeded RSP loading limit guideline six times</li> <li>• Exceeded BOD concentration and loading limit guideline once</li> </ul>			<p>1998 - Facility is implementing operational improvements</p> <p>MOE London Regional Office  1-800-265-7672  Tel: (519) 873-5000  Fax: (519) 873-5020</p>

Southwestern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Contact information	MOE Action/ Contact Info
<p>Lucknow Sewage Treatment Facility</p> <p>Municipal Sewage Treatment</p>	<ul style="list-style-type: none"> <li>Exceeded BOD limit twelve times</li> </ul>	<p>1999 - 12</p> <p>1998 - 1</p> <p>1997 - 9</p>	<p>Lucknow Sewage Ontario Clean Water Agency P.O. Box 190 Lucan, Ontario</p>	<p>1999 - Voluntary abatement program underway</p> <p>1998 - Abatement program established and implemented to address monitoring deficiencies</p> <p>MOE Owen Sound Area Office 1580-20th St. E. P.O. 967 Owen Sound ON N4K 6H6 1-800-265-3783 Tel: (519) 371-2901 Fax: (519) 371-2905</p>

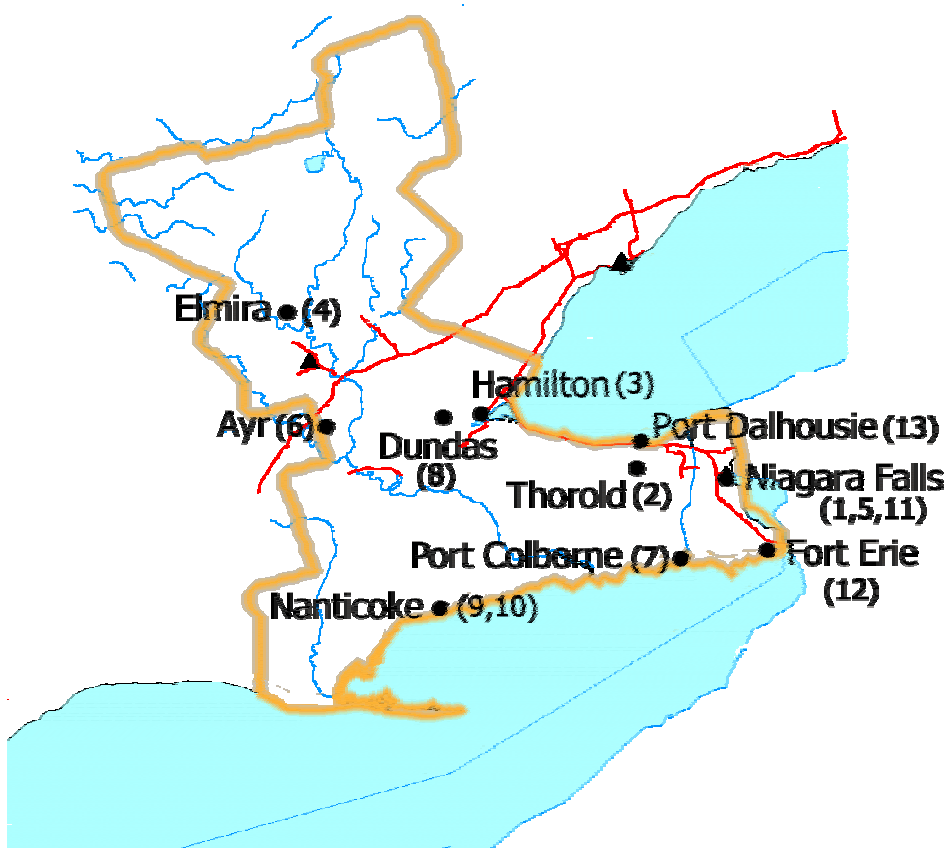
## SUMMARY - Southwest Region Violating Facilities

Total violations by 14 industrial facilities that violated less than 10 times each in 1999.	54
Total violations of 13 industrial facilities that violated more than 10 times each in 1999.	1501
Total violations in southwest region by industry.	<b>1555</b>

Total violations by 15 municipal facilities that violated less than 10 times each in 1999	56
Total violations by 4 municipal facilities that violated more than 10 times each in 1999.	92
Total violations in southwest region by municipalities.	<b>148</b>

Total violations in southwest region	<b>1703</b>
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## WEST CENTRAL REGION



### West Central Region Violating Facilities

1. Cytec Canada Inc.
2. Gallaher-Thorold Paper Company
3. Stelco Hilton Works
4. Sulco Chemicals Ltd.
5. Washington Mills Electro Minerals Company
6. Horizon Poultry Products Inc.
7. Inco Ltd.
8. Rothsay Rendering Plant
9. Ontario Power Generation - Nanticoke Thermal Generating Station
10. Imperial Oil – Nanticoke Refinery
11. Washington Mills Ltd.



<b>West-Central Region Facilities</b>	<b>1999 Wastewater Discharge Violations</b>	<b>History of Violations</b>	<b>Investor Information</b>	<b>Contact information</b>	<b>MOE Action/Contact Info</b>
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<p>Cytec Canada Inc. Niagara Inorganic Chemical Manufacturer</p> <p>Cytec Canada Inc. P.O. Box 240 9061 Garner Road Niagara Falls ON L2E 6T4</p>	<ul style="list-style-type: none"> <li>Exceeded daily pH limit 132 times.</li> <li>Exceeded daily RSP limit 8 times.</li> </ul>	<p>2000 - Yes 1999 - 140 1998 - 55 1997 - 87 1996 - 33 1995 - 6<sup>30</sup> 1994 - 9</p>	<p>The common stock of Cytec Industries Inc. trades on the NYSE under the symbol CYT.</p>	<p>Cytec Industries Inc. 5 Garret Mountain Plaza West Paterson, New Jersey 07424</p> <p>Info@gm.cytec.com International Tel: (973) 357-3193</p>	<p>2000 - Assessment complete - no further action required</p> <p>1999 - Assessment complete - no further action required</p> <p>1998 - Company has initiated an environmental sensitivity study.</p> <p>Ministry of Environment Niagara District Office Toll free: 1-800-263-1035 Tel: (905) 704-3900 Fax: (905) 704-4015</p>
<p>Gallaher Thorold Paper Company Pulp and Paper Manufacturer</p> <p>formerly Thorold Speciality Papers and Noranda Forest Recycled Papers</p>	<ul style="list-style-type: none"> <li>Exceeded toxicity limit 8 times.</li> <li>Exceeded daily BOD limit 82 times and monthly BOD limit 5 times.</li> <li>Exceeded daily solvent extractable limit 35 times and monthly limit 11 times.</li> <li>Exceeded daily phenol limit 4 times and monthly limit once.</li> </ul>	<p>1999 - 100 1998 - 83 1997 - 49 1996 - 9 1993 - 36 1992 - 98</p>	<p>Closed</p>	<p>None</p>	<p>1999 - Control Order Issued</p> <p>1998 - Direction Issued May 1999 to address BOD problem</p> <p>Ministry of Environment Niagara District Office Toll free: 1-800-263-1035 Tel: (905) 704-3900 Fax: (905) 704-4015</p>

<sup>30</sup> Exceedance of policy objective or guideline.

West-Central Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/Contact Info
<p>Stelco Hilton Works</p> <p>Iron and Steel Manufacturer</p> <p>Stelco Inc. General Office P.O. Box 2030, Stelco Tower Hamilton, Ontario L8N 3T1</p>	<ul style="list-style-type: none"> <li>Exceeded toxicity limit twice.</li> <li>Exceeded daily pH limit 23 times.</li> <li>Exceeded monthly cyanide limit twice.</li> <li>Exceeded weekly phenolics limit twice and monthly.<sup>30</sup></li> <li>Exceeded weekly phenolics limit twice.</li> <li>Exceeded weekly benzene limit 5 times and monthly benzene limit 3 times.<sup>31</sup></li> </ul>	<p>2000 - Yes</p> <p>1999 - 39</p> <p>1998 - 50</p> <p>1993 - 1</p> <p>1992 - 1</p>	<p>Owned by Stelco Inc. trades on the TSE under the symbols STE.A.TO and STE.B.TO</p>	<p>Mr. James C. Alfano President and Chief Executive Officer</p> <p>Stelco Inc. PO Box 2030 Hamilton, Ontario L8N 3T1 Ph: (905) 528-2511 Fx: (905) 577-4412</p> <p>Courier Address: 100 King Street West Hamilton, Ontario L8P 1A2 Canada</p>	<p>MOE announced 8 charges against Stelco on July 17, 2001 for non-compliance with a MISA regulation.</p> <p>2000 - Director's control order issued.</p> <p>1999 - Assessment complete no further action/control order being developed.</p> <p>1998 - Facility revised operational process</p> <p>Ministry of the Environment Hamilton Regional Office Toll free: 1-800-668-4557 Tel: (905) 521-7640 Fax: (905) 521-7820</p>

<sup>31</sup> Only weekly benzene, phenolics data provided, missing daily.

West-Central Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/Contact Info
<p>Sulco Chemicals Limited</p> <p>Elmira</p> <p>Inorganic Chemical Manufacturer</p>	<ul style="list-style-type: none"> <li>Exceeded daily pH limit 35 times.</li> <li>Exceeded monthly flourine limit once.</li> </ul>	<p>1999 - 36 1996 - 3 1995 - 4<sup>32</sup> 1994 - 1<sup>31</sup></p>	<p>Owned by Canada Colors and Chemicals Limited</p>	<p>Sulco Chemical Ltd. 60 First Street East Elmira, Ontario Canada M3B2Z5 Ph: (519) 669-5156 Fx: (519) 669-8340</p> <p>Ron Koniuch, General Manager Ph: (519) 669-1332 Email: rkoniuch@canadacolors.com</p>	<p>1999 - Assessment complete no further action required</p> <p>Ministry of the Environment Guelph District Office 1-800-265-8658 Tel: (519) 826-4255 Fax: (519) 826-4286</p>
<p>Washington Mills Electro Minerals Corporation</p> <p>Niagara Falls</p> <p>Inorganic Chemical Manufacturer</p>	<ul style="list-style-type: none"> <li>Exceeded daily RSP limit 22 times.</li> <li>Exceeded daily phosphorus limit once.</li> <li>Exceeded daily aluminium limit four times.</li> </ul>	<p>2000 - Yes 1999 - 27 1998 - 44 1997 - 11 1996 - 10 1995 - 1<sup>33</sup></p>	<p>Not Available</p>	<p>Washington Mills Electro Minerals Company P.O. Box 1002, 7780 Stanley Avenue Niagara Falls, Ontario L2E 6V9</p> <p>1-800-828-1666 info@washingtonmills.com</p>	<p>2000 - Voluntary abatement program underway</p> <p>1999 - Voluntary abatement program underway</p> <p>1998 - MOE drafting order for company to develop a compliance strategy</p> <p>Ministry of Environment Niagara District Office 1-800-263-1035 Tel: (905) 704-3900 Fax: (905) 704-4015</p>

<sup>32</sup> Exceedance of a policy objective or guideline.

<sup>33</sup> Exceedance of a policy objective or guideline.

West-Central Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/Contact Info
<p>Horizon Poultry Products Inc.</p> <p>Food Processing</p> <p>Horizon Poultry P.O. Box 10, 308 Northumberland Street Ayr, Ontario N0B 1E0</p>	<ul style="list-style-type: none"> <li>Exceeded weekly RSP limit 11 times</li> <li>Exceeded weekly phosphorus limit 11 times</li> <li>Exceeded weekly BOD 4 times</li> </ul>	<p>2000 - Yes 1999 - 26 1998 - 73 1996 - 2 1995 - 3 1994 - 11 1993 - 15 1992 - 5</p>	<p>Private</p>	<p>Local address: Lots 18 &amp;19 Con 14. Blanchard Township Perth County ON.</p> <p>Mailing address: P.O. Box 1180 St. Mary's ON. N4X 1B7</p> <p>Tel: (519) 229-8900 Fax: (519) 229-8953</p>	<p>2000 - Assessment complete no further action required/ voluntary abatement program underway</p> <p>1999 - Under investigation</p> <p>1998 - Certificate of Approval for expansion of treatment facility</p> <p>Ministry of the Environment Guelph District Office 1-800-265-8658 Tel: (519) 826-4255 Fax: (519) 826-4286</p>
<p>Inco Limited</p> <p>Metal Refinery</p> <p>INCO Ltd. P.O. Box 250, 187 Davis Street Port Colborne, Ontario L3K 5W2</p>	<ul style="list-style-type: none"> <li>Exceeded monthly toxicity limit 18 times.</li> <li>Exceeded daily pH limit once.</li> <li>Exceeded weekly Cu limit twice and monthly Cu limit once.</li> </ul>	<p>2000 - Yes 1999 -22 1998 - 6 1997 - 3 1995 - 18<sup>34</sup> 1994 - 7<sup>33</sup></p>	<p>Trading on the TSE and the NYSE under the symbol N (common shares) and N.PR.U. preferred shares</p>	<p>Scott M. Hand President, Chief Executive Officer</p> <p>Michael D. Sopko Chairman of the Board</p>	<p>2000 - Director's control order issued</p> <p>1999 - Assessment complete no further action required/control order being developed</p> <p>1998 - Program Approval under review</p>

<sup>34</sup> Exceedance of policy objective or guideline.

<b>West-Central Region Facilities</b>	<b>1999 Wastewater Discharge Violations</b>	<b>History of Violations</b>	<b>Investor Information</b>	<b>Contact information</b>	<b>MOE Action/Contact Info</b>
Inco continued				<p>Anthony E. Munday Executive Vice President and Chief Financial Office</p> <p>W. Charles Ferguson Vice President - Environment, Health and Safety</p> <p>145 King Street West Suite 1500 Toronto, M5H 4B7 Tel: (416) 361-7511 Fax: (416) 361-7781</p>	<p>Ministry of the Environment Niagara District Office Toll free: 1-800-263-1035 Tel: (905) 704-3900 Fax: (905) 704-4015</p>

West-Central Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/Contact Info
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<p>Rothsay Rendering Food Processing</p> <p>Rothsay Rendering Plant P.O. Box 8270 Dundas, Ontario L9H 5G1</p>	<ul style="list-style-type: none"> <li>Exceeded daily limit for solvent extractable 8 times</li> <li>Exceeded daily limit for phosphorus 13 times</li> </ul>	<p>2000 - Yes 1999 - 21 1998 - 16 1996 - 5 1995 - 3<sup>35</sup> 1994 - 4<sup>34</sup> 1993 - 12<sup>34</sup> 1992 - 4<sup>34</sup></p>	<p>Owned by Maple Leaf Foods trading on the TSE under the symbol MFI</p>	<p>Michael H. McCain President and Chief Executive Officer of Maple Leaf Foods</p> <p>General inquiry number Tel: (416) 926-2000</p>	<p>Ministry announced that Rothsay was convicted of seven charges on May 10, 2001.</p> <p>2000 - Assessment complete no further action required</p> <p>1999 - Under investigation</p> <p>1998 - Under investigation</p> <p>MOE Hamilton Regional Office Tel: (905) 521-7640 Fax: (905) 521-7820</p>
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<sup>35</sup> Exceedance of policy objective or guideline.

West-Central Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/Contact Info
<p>Ontario Power Generation Nanticoke Thermal Generating Station</p> <p>Electricity Generator</p> <p>Nanticoke TGS P.O. Box 2000, Con. 1 Lots 7,8&amp;9 Nanticoke, Ontario NOA 1L0</p>	<ul style="list-style-type: none"> <li>Exceeded daily RSP limit 11 times.</li> <li>Exceeded daily phosphorus limit twice.</li> <li>Exceeded daily zinc limit four times.</li> <li>Exceeded daily BOD limit twice.</li> </ul>	<p>2000 - Yes 1999 - 19 1998 - 5+ 1997 - 23 1996 - 22 1994 - 25 1993 - 26 1992 - 2</p>	<p>Owned and Operated by Ontario Power Generation which is owned by the government of Ontario</p>	<p>Ron Osborne President and CEO</p> <p>Ron Osborne Executive VP</p> <p>700 University Avenue Toronto, ON M5G 1X6</p> <p>General inquiries of OPG should be directed to (416) 592-2555 1-877-592-2555 Fax: (416) 592-2178</p>	<p>2000 - Assessment complete no further action required</p> <p>1999 - Assessment complete no further action required</p> <p>Ministry of the Environment Hamilton Regional Office Tel: (905) 521-7640 Fax: (905) 521-7820</p>
<p>Imperial Oil Nanticoke</p> <p>Petroleum Refinery</p> <p>Imperial Oil (Nanticoke Refinery) P.O. Box 500, Concession 2 Road Nanticoke, Ontario NOA 1L0</p>	<ul style="list-style-type: none"> <li>Exceeded daily pH limit 8 times.</li> <li>Exceeded daily DOC limit twice and monthly DOC limit once.</li> </ul>	<p>1999 - 11</p>	<p>Listed on the TSE under the symbol IMO</p>	<p>R.B. Peterson Chairman, president and CEO</p> <p>Corporate Head Office: Imperial Oil Limited, 111 St. Clair Ave. W., P.O. Box 4029, Stn. A, Toronto M5W 1K3. 1-800-567-ESSO Nanticoke Refinery Tel: (519) 587-7000</p>	<p>1999 - Voluntary abatement program underway</p> <p>Ministry of the Environment Hamilton Regional Office Toll free: 1-800-668-4557 Tel: (905) 521-7640 Fax: (905) 521-7820</p>

West-Central Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE Action/Contact Info
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<p>Washington Mills Limited Niagara Falls</p> <p>Inorganic Chemical Manufacturer</p> <p>Washington Mills Limited P.O. Box 2025 6225 Progress St. Niagara Falls, Ontario L2E 6Z2</p>	<ul style="list-style-type: none"> <li>• Exceeded daily RSP limit 13 times.</li> <li>• Exceeded weekly RSP limit once.</li> <li>• Exceeded monthly aluminium limit once</li> </ul>	<p>2000 - Yes 1999 - 15 1998 - 3 1992 - 1<sup>36</sup></p>	<p>Not Available</p>	<p>Washington Mills Limited P.O. Box 2025, 6225 Progress St. Niagara Falls, Ontario L2E 6Z2 1-800-828-1666 info@washingtonmills.com</p>	<p>2000 – Voluntary abatement program underway</p> <p>1999 – Assessment complete no further action required</p> <p>Ministry of Environment Niagara District Office 1-800-263-1035 Tel: (905) 704-3900 Fax: (905) 704-4015</p>
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<sup>36</sup> Exceedance of policy objective or guideline.



<b>West-Central Region Facilities</b>	<b>1999 Wastewater Discharge Violations</b>	<b>History of Violations</b>	<b>Contact information</b>	<b>MOE Action/Contact Info</b>
Biggar Lagoon Municipal Sewage Treatment	<ul style="list-style-type: none"> <li>• Exceeded RSP limit 13 times.</li> <li>• Exceeded BOD limit three times.</li> </ul>	1999 - 16 1998 - 6 1993 - 4	Biggar Lagoon Regional Municipality of Niagara c/o Fort Erie Pollution Control Plant 1 Anger Avenue Fort Erie, Ontario L2A 5M4	1999 - Voluntary abatement program underway  1998 - To be decommissioned in 2000.  MOE Niagara District Office 1-800-263-1035 Tel: (905) 704-3900 Fax: (905) 704-4015
Port Dalhousie Municipal Sewage Treatment	<ul style="list-style-type: none"> <li>• Exceeded BOD limit 16 times.</li> </ul>	1999 - 16 1998 - 1 1993 - 2	Port Dalhousie Water Pollution Control Plant 40 Lighthouse St. Catharines, Ontario L2M 7P5	1999 - Voluntary abatement program underway  1998 - Facility implementing operational improvements  MOE Niagara District Office 1-800-263-1035 Tel: (905) 704-3900 Fax: (905) 704-4015

## SUMMARY - West Central Region Violating Facilities

Total violations by 7 industrial facilities that violated less than 10 times each in 1999	31
Total of violations by 12 industrial facilities that violated more than 10 times each in 1999.	490
Total violations in West Central region by industry	<b>521</b>

Total violations by 11 municipal facilities that violated less than 10 times in 1999	33
Total violations by 2 municipal facilities that violated more than 10 times in 1999.	32
Total violations in West Central region by municipalities	<b>65</b>

Total violations in West-Central region	<b>586</b>
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## NORTHERN REGION



### Northern Region Violating Facilities

1. Longlac Wood Industries Inc.
2. Praxair Canada Inc.
3. Northern Wood Preservers Inc. – NOWPARC Operation
4. Ontario Power Generation – Atikokan Thermal Generating Station
5. Inmet Mining Corporation – Winston Lake
6. Ontario Power Generation – Thunder Bay Thermal Generating Station
7. Falconbridge Ltd. – Kidd Creek Mine Site

Northern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE action/contact information
<p>Longlac Wood Industries Pulp and Paper</p> <p>Longlac Wood Industries Inc. Postal Bag 2000, Katamaki Rd. Longlac, Ontario P0T 2A0</p>	<ul style="list-style-type: none"> <li>Exceeded daily RSP limit 13 times</li> <li>Exceeded temperature rise 28 times</li> <li>Exceeded daily BOD limit six times</li> <li>Exceeded daily phenol limit 20 times</li> </ul>	<p>1999 - 67 1998 - 17 1997 - 6</p>	<p>Owned by Kruger Inc. Kruger Inc. is a privately owned company.</p> <p>Joseph Kruger II is Chairman of the Board and CEO of Kruger Inc. and its subsidiaries in Canada, the United States and the United Kingdom.</p>	<p>Kruger Inc. 3285 Chemin Bedford Montréal (Québec) Canada H3S 1G5 Tel:(514) 737-1131 Fax:(514) 343-3124</p> <p>Longlac Wood Industries Inc. 2000 Argentia Road, Suite 200 Mississauga ON L5N 1P7 Tel: (905) 542-2700 Fax: (905) 542-3034 Contact: James McPherson</p>	<p>1999- Assessment complete no further action required/ no charges laid.</p> <p>Ministry of the Environment Timmins District Office Tel: (705) 235-1500 Fax: (705) 235-1520</p>
<p>Praxair Sault Ste. Marie</p> <p>Inorganic Chemical Manufacturer</p> <p>Praxair Canada Inc. P.O. Box 937, 1 Patrick Street Sault Ste. Marie, Ontario P6A 5N5</p>	<ul style="list-style-type: none"> <li>Exceeded daily pH limit 7 times.</li> <li>Exceeded daily solvent extractable limit twice and monthly solvent extractable limit once.</li> <li>Exceeded daily copper limit 22 times and weekly copper limit 7 times.</li> </ul>	<p>2000 - Yes 1999 - 43 1998 - 37</p>	<p>Trades on the NYSE under the symbol PX</p>	<p>Dennis H. Reilley, Chairman and CEO</p> <p>Corporate Communications Praxair, Inc. 39 Old Ridgebury Road Danbury, CT 06810-5113 800-PRAXAIR</p> <p>Outside the U.S. e-mail: info@praxair.com</p>	<p>2000 - Under investigation/Provincial Officer's order issued</p> <p>1999 - Program approval issued</p> <p>1998 - Facility revised operation procedure</p>

Northern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE action/contact information
Praxair continued	<ul style="list-style-type: none"> <li>Exceeded monthly DOC limit 4 times.</li> </ul>			Canadian Head Office 1 City Centre Drive, Suite 1200 Mississauga Ontario L5B 1M2 Canada Tel: 905.803.1600 Fax: 905.803.1690	MOE Sault Ste. Marie Area Office Toll free from area codes 705/807: 1-800-965-9990 Tel: (705) 949-4640 Fax: (705) 945-6868
NOWPARC (Northern Wood Preservers Alternative Remediation Concept)  Remediation of contaminated site  Northern Wood Preservers Inc. NOWPARC Operation P.O. Box 29039, McIntyre Centre Thunder Bay, ON P7B 6P9	<ul style="list-style-type: none"> <li>Exceeded Polycyclic Aromatic Hydrocarbon limit 35 times</li> </ul>	2000 - Yes 1999 - 35 1998 - 10	Project proponents are Environment Canada, Ontario Ministry of the Environment, Northern Wood Preservers, Abitibi Consolidated and the Canadian National Railway Company	Roger Santiago Remediations Technology Program Environment Canada 4905 Dufferin St. Downsview Ontario M3H 5T4 Tel.416.739.5876  Pat Inch MOE Northern Region Suite 331, 435 James Street South Thunder Bay Ontario P7E 6S7 Tel. 807.475.1723	2000 - Under investigation/ voluntary abatement program underway  1999 - Assessment complete no further action/ under investigation  Ministry of the Environment Thunder Bay Regional Office 1-800-875-7772 Tel: (807) 475-1205 Fax: (807) 475-1754

Northern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE action/contact information
<p>Ontario Power Generation Atikokan Thermal Generating Station</p> <p>Electric Power Generator</p> <p>Ontario Power Generation Atikokan Thermal Generating Station P. O. Box 1900 Atikokan, Ontario POT 1C0</p>	<ul style="list-style-type: none"> <li>Exceeded the acute lethality (toxicity) for trout once.</li> <li>Exceeded the daily pH limit 5 times.</li> <li>Exceed the allowable temperature differential 9 times.</li> </ul>	<p>2000 - Yes 1999 - 15 1998 - yes number unknown 1996 - 3</p>	<p>Owned by Ontario Power Generation, which is owned by the Ontario government.</p>	<p>William Farlinger, President and CEO</p> <p>Ron Osborne Executive VP</p> <p>700 University Avenue, Toronto, ON, M5G 1X6</p> <p>General inquiries of Ontario Power Generation should be directed to 1-877-592-2555 Ph: (416) 592-2555 Fx: (416) 592-2178</p>	<p>2000 - Voluntary abatement program underway</p> <p>1999 - Assessment complete no further action required</p> <p>1998 - Facility revised operational procedure</p> <p>Ministry of the Environment Thunder Bay Regional Office Toll free from area 1-800-875-7772 Tel: (807) 475-1205 Fax: (807) 475-1754</p>
<p>Inmet Mining Schreiber Metal Mining Inmet Mining Corporation Winston Lake Schreiber, ON POT 2S0 (807) 824-3368</p>	<ul style="list-style-type: none"> <li>Exceed the monthly trout toxicity test six times</li> <li>Exceeded the monthly daphnia magna toxicity test six times.</li> </ul>	<p>1999 - 12 1997 - 2 1996 - 1 1995 - 1</p>	<p>Trades on the TSE under the Symbol IMN</p>	<p>William James Chairman of the Board</p> <p>Richard A. Ross President and Chief Executive Officer</p> <p>Craig Ford Director, Safety, Health and Environment</p>	<p>1999 - Assessment complete no-further action required</p> <p>Ministry of the Environment Thunder Bay Regional Office 1-800-875-7772 Tel: (807) 475-1205 Fax: (807) 475-1754</p>

Northern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE action/contact information
Inmet continued				Inmet Mining Corp. Maritime Life Tower, Suite 3400 79 Wellington Street W P.O. Box 19, TD Centre Toronto, Ontario, M5K 1A1 Tel: (416) 361-6400 Fax: (416) 368-4692 Email: investor@inmet-toronto.com	
Ontario Power Generation Thunder Bay TGS  Electric Power Generator  Thunder Bay Thermal Generating Station P.O. Box 108 <sup>th</sup> Avenue Thunder Bay, Ontario	<ul style="list-style-type: none"> <li>Exceeded the weekly solvent extractable limit 4 times and monthly average twice.</li> <li>Exceeded the weekly iron limit three times and the monthly iron limit twice.</li> </ul>	2000 - Yes 1999 - 11 1998 - 7 1997 - 3	Owned by Ontario Power Generation which is owned by the Ontario government	William Farlinger President and CEO  Ron Osborne Executive VP  700 University Avenue, Toronto, ON, M5G 1X6  General inquiries of Ontario Power Generation should be directed to (416) 592-2555 or toll-free at 1-877-592-2555 Fax 416-592-2178	2000 - Assessment complete no further action required.  1999 - Voluntary abatement program underway  1998 - Facility revised operation procedure  MOE Thunder Bay Regional Office 1-800-875-7772 Tel: (807) 475-1205 Fax: (807) 475-1754

Northern Region Facilities	1999 Wastewater Discharge Violations	History of Violations	Investor Information	Contact information	MOE action/contact information
<p>Falconbridge Kidd Creek Mine site</p> <p>Metal Mine</p> <p>Falconbridge Limited Kidd Creek Mine Site P. O. Bag 2002 Timmins, Ontario P4N 7K1</p>	<ul style="list-style-type: none"> <li>Exceeded monthly toxicity limit once.</li> <li>Exceeded weekly Zinc limit 7 times and monthly zinc limit twice.</li> </ul>	<p>2000 - Yes 1999 - 10 1998 - 10 1997 - 10 1996 - 37 1995 - 23 1994 - 1 1992 - 3<sup>37</sup></p>	<p>Trades on the TSE under the symbol FL</p>	<p>Øyvind Hushovd, President and Chief Executive Officer</p> <p>Corporate Office Falconbridge Limited Suite 1200 95 Wellington Street West Toronto, Ontario, M5J 2V4</p> <p>Bev Pickard Environment (416) 956-5832</p> <p>Marguerite Manshreck- Head Director, Investor Relations Telephone: (416) 956-5765 invest@falconbridge.com</p> <p>Telephone: (416) 956-5700 Fax: (416) 956-5757</p>	<p>2000 - Voluntary abatement program underway/ Director's Control Order issued</p> <p>1999 - Voluntary abatement program underway</p> <p>1998 - Facility implementing operation improvements</p> <p>Ministry of the Environment Timmins District Office Toll free: 1-800-380-6615 Tel: (705) 235-1500 Fax: (705) 235-1520</p>

<sup>37</sup> Exceedance of a policy objective or guideline.



## SUMMARY – Northern Region Violating Facilities

Total violations by 32 industrial facilities that violated less than 10 times each in 1999.	99
Total violations by 7 industrial facilities that violated more than 10 times each in 1999.	193
Total violations in northern region by industry.	<b>292</b>

Total violations by 5 municipal facilities that violated less than 10 times each in 1999	11
Total violations by 0 municipal facilities that violated more than 10 times each in 1999.	0
Total violations in northern region by municipalities	<b>11</b>

Total violations in northern region	<b>303</b>
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Total violations in 1999	<b>3296</b>
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## Glossary

BOD = Biological Oxygen Demand

COD = Chemical Oxygen Demand

EPA = Environmental Protection Act

FOI = Freedom of Information

IPC = Information and Privacy Commission

MISA = Municipal Industrial Strategy for Abatement

MOE = Ministry of the Environment

OWRA = Ontario Water Resources Act

RSP = Residual Suspended Particulate (or TSS - Total Suspended Solids)

TKN = Total Kjeldahl Nitrogen

VSS = Volatile suspended solids

## **Sierra Legal Defence Fund**

*Ontario Office*

*30 St. Patrick Street - Suite 900*

*Toronto ON M5T 3A3*

*Phone: (416) 363-7533*

*Fax: (416) 363-2746*

*[www.sierralegal.org](http://www.sierralegal.org)*