# RESPONSIBLE CARE®
## Verification Report

### Chemtura Canada Co/Cie
December 1 - 2, 2015

Chemistry Industry Association of Canada

Responsible Care®
Our commitment to sustainability.

**Disclaimer**

This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC), to provide advice to the member-company and assist it in meeting its Responsible Care® commitments. The material in this report reflects the team's best judgment in light of the information available to it at the time of preparation. It is the responsibility of the CIAC member-company that is the subject of this report to interpret and act on the report's findings and recommendations as it sees fit. Any use which a third party makes of this document, or any reliance on the document or decisions made based upon it, are the responsibility of such third parties.  Although CIAC members are expected to share the results of this guidance document with interested parties, the Association, its member-companies, their employees, consultants and other participants involved in preparing the document accept no responsibility whatsoever for damages, if any, suffered by a third party as a result of decisions made or actions based on this report.

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# EXECUTIVE SUMMARY

This report documents the observations and conclusions of the independent verification team tasked with conducting a Responsible Care® verification of Chemtura Canada Co./Cie. (Chemtura) The verification was conducted on December 1st and 2nd 2015 and included a team visit to the Elmira Ontario Canadian head office and manufacturing facility. The company also maintains a warehousing operation on Bonnie Crescent in Elmira and a manufacturing facility in West Hill Ontario. All Responsible Care Management Systems reviewed pertain to all Canadian operations. This was the forth verification completed for Chemtura with the previous verification completed on March 7th. 2013. The verification conducted on December 1st and 2nd 2015 was an integrated verification. This is the terminology used by the CIAC to describe a verification that verifies Responsible Care compliance based on the CIAC Responsible Care Commitments and an ISO based technical standard like RC 14001. This report is based on a review of company documents, internal and external RC14001 audits, site interviews with key personnel and communication with corporate personnel and community stakeholders by telephone and e-mail.

This report will list findings requiring action, improvement opportunities, work in progress and successful practices.

On June 29th 2016 the verification team reconvened to review the RC 14001 third party audit reports, the status of a local residential zoning challenge and the corporate management systems that address Stewardship Code elements ST93 through ST99.

As a result of the examination conducted, the verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement. The team believes that the company is capable of responding to the range of Findings Requiring Action identified during the re-verification, summarized below and discussed in detail in the report. The re-verification is complete and no further involvement is required by the verification team. The final report will be shared with the Elmira and West Hill communities and the general public.

Signed:
Verification Team Leader.
Date: July 4th 2016

For more information on this or a previous Responsible Care Verification Report, please contact your local site or the Company's overall Responsible Care Coordinator:

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# SUMMARY OF VERIFICATION TEAM OBSERVATIONS

**Findings Requiring Action:**

1. There is a finding requiring action at the Elmira and West Hill sites to review and revise as required the Community Dialogue Management System to ensure that code elements AC 125 through AC 136 are applied to the community outside the Remediation Advisory Committee, the Remediation Technical Advisory Group, the Woolwich CAER group and the Toronto East CAER group.

2. There is a finding requiring action to review and revise as required the Chemtura Site Emergency Plans to ensure that the plans are comprehensive enough to address site emergencies such as: Disgruntled employees, an active shooter, two-way communication and support during incidents outside normal business hours and appropriate response to terrorist threats or incidents. (OP 48)

3. There is a finding requiring action to review and revise as required the management system for Critical Infrastructure and Business Continuity to ensure that the management system is comprehensive enough to comply with code requirements. (OP 49-55)

4. There is a finding requiring action to implement a management system to promote Responsible Care® by name. Reference the CIAC document "Promoting Responsible Care®: Implementation and Guidance." (OP 81-84, ST 100-103, AC132,140,143,150 and 152)

**Works in Progress:**

1. The 2011 verification report listed as a Finding Requiring Action that the Chemtura West Hill site in particular, and the Toronto East CAER group in general, had not addressed the issue of how to ensure that people using the local recreational facilities and who could be impacted by a site worst case scenario are aware of the local warning system and how to provide shelter in place for those using the facilities during such an event. While progress has been made by expanding the CAER group membership to include city employees and the distribution of information on shelter in place, the issue of providing a shelter in place venue has not been resolved and continues as a work in progress.

2. As of December 2015 the Company was still struggling to adapt the CIAC Responsible Care® training modules due to firewalls on the Company internet access. There is in-house Responsible Care® training available but it is not as comprehensive as the CIAC sponsored training.

**Improvement Opportunities:**

1. There is an improvement opportunity to review the program to address energy cost savings by assessing the potential cost savings in reducing "phantom power usage" at both company sites. See the Ontario Ministry of Energy website. [www.energy.gov.on.can](www.energy.gov.on.can) . Reference phantom power usage data.

2. There is an improvement opportunity to review the Management of Change management system to determine if cyber attacks on process related wireless portals is given consideration.

**Successful Practices:**

1. The team notes as a successful practice the participation of Chemtura in the Toronto East CAER group which promotes involvement with local schools and utilizing student backpack information flyers as a method of highlighting local emergency sirens and shelter in place protective maneuvers.

2. The team notes as a successful practice the Source Separation Plan which is a comprehensive recycling management system that features such innovations as waste paper towel recycling, pens and ink markers and Keurig K-cups.

3. The team views as a successful practice the implementation of the P-A-U-S-E behavior based safety management system that includes a process for worker feedback on observed potential workplace hazards.

# INTRODUCTION

## About Responsible Care Verification

As a member of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for Chemtura operations in Canada attests annually to CIAC and its peers that the company's operations conform to the expectations contained in the Responsible Care Commitments and are guided by *Responsible Care Ethic and Principles for Sustainability.*

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### *The Responsible Care® Ethic and Principles for Sustainability*

*We are committed to do the right thing, and be seen to do the right thing.*

*We dedicate ourselves, our technology and our business practices to sustainability - the betterment of society, the environment and the economy. The principles of Responsible Care® are key to our business success, and compel us to*:

- work for the improvement of people's lives and the environment, while striving to do no harm;
- be accountable and responsive to the public, especially our local communities, who have the right to understand the risks and benefits of what we do;
- take preventative action to protect health and the environment;
- innovate for safer products and processes that conserve resources and provide enhanced value;
- engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life-cycles;
- understand and meet expectations for social responsibility;
- work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirements and meet or exceed their letter and spirit;
- promote awareness of Responsible Care, and inspire others to commit to these principles.

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As an element of this commitment to Responsible Care, Chemtura must, every three years, participate in an external verification intended to:

1. Provide the Executive Contact with an external perspective when assessing if the company is indeed meeting the intent of the Responsible Care Commitments, along with advice on areas that may require attention;
2. Identify opportunities for assisting the company when benchmarking its own practices and performance against those of its peers, thus supporting continual improvement;
3. Contribute to the credibility of Responsible Care amongst company personnel and stakeholders, as well as the stakeholders of the broader industry;
4. Identify successful company practices that can be promoted to peers in the CIAC membership; and
5. Support the identification of areas of common weakness so that collective tools and guidance can be developed to improve performance in those areas across the CIAC membership.

Verification is conducted according to a common protocol, developed by the association's members and others, including several critics of the chemical industry. The verification is conducted by a team consisting of:

- Knowledgeable industry experts with experience in Responsible Care;
- A representative of the public at large (usually with a public interest background and with experience in Responsible Care gained from serving on the CIAC's National Advisory Panel) and;
- One or more representatives of the local communities where the company's facilities are located.

Once completed, the Verification Report is made publicly available through the CIAC website at www.canadianchemistry.ca.  Chemtura is also expected to share the report with interested persons in its communities and other stakeholders as part of its ongoing dialogue processes.

Additional information on Responsible Care and / or the verification process can be found at the CIAC website www.canadianchemistry.ca, or by contacting CIAC Responsible Care at glaurin@canadianchemistry.ca or (613) 237-6215 extension 233.

The verification team was comprised of the following individuals.

| Name | Affiliation | Representing |
|------|-------------|-------------|
| Cameron Dillabough | CIAC | Team Leader |
| Debbie Krukowski | CIAC | Community at large Representative |
| David Hofbauer | Woolwich Township Representative | The Woolwich Township Community |

## About Chemtura

Chemtura Canada Co./Cie (Chemtura) is a wholly owned subsidiary of Chemtura Corporation, headquartered in Philadelphia, Pennsylvania, USA. The global corporation employs 2,700 people and had sales dollars in 2014 of $2.2B.

The Canadian company headquarters, principal operating facility and research pilot plant are located in Elmira Ontario. A second manufacturing facility is located in West Hill (Scarborough) Ontario. The company also maintains a leased warehouse in Elmira, 1.5 Km from the plant site.

There were approximately 244 employees in Canada in 2014.The company manufactures and formulates petroleum additives, anti-oxidants, UV stabilizers and seed protectant fungicides at the Elmira site and petroleum additives at the West Hill location. For additional information please consult the Chemtura Corporation website: www.chemtura.com and the Chemtura Canada website: www.chemtura.ca

## About This Verification

The 2015 verification of Chemtura Canada Co./Cie (Chemtura) was conducted as an integrated verification utilizing the certification of the Chemtura RC 14001 management systems by The British Standards Institute(BSI) and the verification of the Company management systems that support specific Canadian Responsible Care Code requirements that are not part of the ISO/RC Technical Standards requirements. The Chemtura RC 14001 based Management Systems are recognized by the CIAC as being viable management systems to support the three CIAC Responsible Care® Codes (Operations, Stewardship and Accountability). Responsible Care® management system components unique to the CIAC are listed below and were the focus of this verification.

A planning and Organization meeting was held on November 6th 2015 and the verification visit took December 1st and 2nd 2015. This fourth verification of Chemtura was the first integrated verification. As of the planning meeting date recent certification audits had not been conducted by BSI because of scheduling difficulties. The verification team and the company agreed to conduct the verification as an interim measure and return to Chemtura in March 2016 to review the certification audits conducted by BSI of the Elmira and West Hill sites and the plans developed by the company to address any audit or verification findings. Due to internal scheduling issues with BSI the RC14001 audits of the Chemtura facilities did not take place until early in the second quarter of 2016. As a consequence, the audit review meeting with the verification team took place on June 29th 2016.

## Operations Code

Based on a CIAC gap analysis it has been determined that RC14001 certification covers the expectation of the Responsible Care Operations Code expectation except for certain aspects of Operations Code elements OP48 through OP55. Team comments on those specific areas are:

### a) Malicious Intent.

There is a corporate management system in place to address malicious intent from a general perspective at the corporate level. There are however some identified gaps at the site level that do not fulfill this code expectation in today's environment. Some examples would be the identification and addressing disgruntled employees, active shooters, workplace violence, family violence affecting the workplace, family support and notification during workplace upset conditions such as weather related events. The team has listed a finding requiring action to review and revise the Canadian management system(s) related to this code element.  (FRA#2)

### b) Critical Infrastructure & Business Continuity.

Again there is a corporate management system in place to address this topic from a corporate perspective. There are however potential gap areas in the Site(s) Emergency Response Plan to address two-way communication from the work site, support for family members during upset conditions and employee long term work commitment support during extreme weather events. The team has listed a finding requiring action to review and revise the Canadian management system(s) related to this code element. (FRA#3)

Under the Operations Code the team listed as a successful practice the implementation of the P-A-U-S-E behavior based safety management system that includes a process for worker feedback on observed potential workplace hazards.

## Stewardship Code:

Based on a CIAC gap analysis it has been determined that the RC14001 certification process placed a limited emphasis on the Code Elements of the CIAC Stewardship Code. As a result, the verification team examined the management systems related to the following Code Elements.

### a) Stewardship Code expectations beyond Research and Development.

Responsibility for the code elements related to this topic reside mainly with the American parent company Chemtura Corporation. During the December 2015 interview process it was unclear if all code requirements in this area were covered by corporate policies, standards and procedures. Prior to the June 29th 2016 meeting the company provided a synopsis of corporate policies, standards and procedures that support the expectations of code elements ST93 to ST102.

### b) Resource conservation.

There is a published corporate commitment to sustainable manufacturing processes and resource conservation. Corporate standards and procedures reviewed by the team support a commitment to conserving resources. Chemtura Corporation is also a signatory to various international agreements concerning the protection of the environment, sourcing raw materials and control of chemical products. For a more detailed review of these commitments please see: www.chemtura.com

### c) Historical waste practices.

There is a Canadian Corporate management system in place to require the maintenance historical records concerning waste disposal sites and legacy disposal sites associated with site closures and changes in site product focus. During the interview process the team reviewed the long term remediation plans associated with the Elmira site ground water contamination legacy issues.

In 2015 the local oversight process, which is the purview of Woolwich Township, was reorganized with the objective of improving the technical efficiency of the process. The present organization consists of a Remediation Advisory Group with an oversight focus and a Technical Advisory Group to develop and administer the technical aspects of remediation.

## Accountability Code:
Consistent with the benchmarking exercise conducted by the CIAC, the verification team confirmed that several key aspects of the Accountability Code and related Appendices were not addressed by the formal RC14001 certification process. As a result, the verification team spent the majority of its time focused on key issues related to this code and reached the following conclusions.

## a) Leadership expectations.
Application of the Responsible Care® Principles and Ethic: See appendix "A"

## Transparency and Public Involvement in the verification/ Certification Process:
Chemtura has in place management systems that support public inclusion and operational transparency in the day to day operations of the sites, future planning, public awareness of Responsible Care® and a local social responsibility focus. Management of both sites participates in local CAER groups and advisory panels.

## Engagement at Site Communities:
Both the Elmira and West Hill sites have management systems to address the code requirement to engage in a dialogue process with the community. While Elmira does have a recognized unique situation in regard to legacy remediation issues there are other aspects to community dialogue that require a reassessment of the company focus. Both sites tend to use community advisory panels or similar joint efforts to address the code expectations but aspects such as worst case scenario (WCS) information specific to each site, ensuring those affected by a specific site WCS know what action to take in a site emergency event and ensuring site contact information is well known in the community are areas that need to be addressed. The team has listed a finding requiring action (FRA #1) related to this specific area.

## Sustainability Management Systems, Corporate Social Responsibility Initiatives:
From a corporate perspective and a verification perspective these two topics are addressed under the realm of "Corporate Responsibility". Based on information from the corporate web site www.chemtura.com these principles underpin the philosophy and daily operations of the company. During the verification the Canadian company demonstrated various corporate "check" components that are in place to ensure the philosophy of Corporate Responsibility are part of global operations. The Canadian company also demonstrated specific examples of this philosophy being applied to there area of responsibility.

## Promotion of Responsible Care by Name:
During the verification process the company demonstrated several areas where they have been proactive in ensuring the term "Responsible Care®" is prominent in presentations and documentations. It is the expectation of the CIAC, however, that a formal management system be in place for the promotion of Responsible Care® by name. The team has listed a finding requiring action (#4) related to this specific area.

## CIAC Benchmarks and Collective Expectations:

## a) TransCAER Participation
Based on data supplied by the CIAC Chemtura representatives attended all 2014 and 2015 scheduled TransCAER subcommittee meetings. The company supported, through the Toronto East Care Group, local emergency responder training utilizing the CIAC sponsored emergency response training rail tanker.

APPENDICES TO THE RESPONSIBLE CARE CODES: SOCIAL RESPONSIBILITY

Social Responsibility is an overarching value supported at the corporate level. Various initiatives such as "Making Sustainability a Core Value", a comprehensive Code of Conduct policy and a corporate focus on Community Involvement are examples of corporate social responsibility commitments. Support for Responsible Care in all jurisdictions and embracing international agreements such as the REACH chemical control initiative are other examples. The 2015 Chemtura Social Responsibility Report can be viewed at:
www.chemtura.com/Pages/Sustainability.aspx

APPENDICES TO CODES: INVOLVEMENT IN PUBLIC POLICY PROCESS

There are management systems in place that enable the Chemtura managers to be engage in public policy issues whether in support of CIAC initiatives at the federal or provincial level or at the local level in support of efforts such as protecting plant buffer zones from encroachment.

TEAM OBSERVATIONS ON THE COMPANY MANAGEMENT SYSTEM

As previously related in this report Chemtura Company and the Canadian entity Chemtura Canada Co./Cie. have in place comprehensive management systems to ensure corporate goals and objectives are met and regulatory compliance is maintained. Theses management systems are structured on the ISO technical management system standards RC14001:2013. This management system is based on the Plan, Do, Check and Act continual improvement philosophy. Corporate goals and objectives, including those that support or emulate the CIAC Responsible Care® Ethic and Principles for Sustainability are in place. The management systems supporting RC14001:2013 are externally audited by the British Standards Institution (BSI) a third party standards compliance company. Additional Management Systems related to Responsible Care® in Canada are internally audited by Chemtura and verified tri-annually by the CIAC

Observations on the PLAN Step

Chemtura Company has in place a comprehensive planning process that supports the company philosophy, goals and improvement objectives. The goals and objectives that support Responsible Care, Sustainability and Social Responsibility are aligned with those of the American Chemistry Council. The Canadian entity annually develops goals and objectives that support these corporate efforts and are subsequently aligned with Responsible Care®, Sustainability and Social Responsibility management systems of the CIAC

Observations on the DO Step

Management systems have been developed to guide managers and employees in achieving the expectations of the company whether from a business perspective or in support of the expectations of Responsible Care®. The Global Responsible Care® Management System Manual (RCMS) provides a standardized approach to the development of policies and procedures within the company. Each corporate entity, including Chemtura Canada, have developed policies and procedures based on local environmental, health and safety regulatory requirements and the Global RCMS. Functional operating procedures are also in place based on RC 14001:2013, ISO14001:2004 and ISO 9001:2008 standards.

Observations on the CHECK Step

The checking function pertaining to the Chemtura Canada management systems is a comprehensive overlap of triennial external corporate audits regarding environmental, health, safety, sustainability and process safety management systems. RC 14001:2013 management system performance is also audited externally on an annual basis with a triennial certification. The Joint Health and Safety Committees (JHSC) at each Canadian site perform monthly EH&S inspections and RC 14001 internal annual audits are conducted by trained personnel.

Observations on the ACT Step

There is a comprehensive management system in place to address the corrective actions or improvement opportunities that might result from the "checking" process. Some components are monthly managerial site performance reviews, management reviews related to ISO/RC management system required audits and JHSC inspections and recommendations. Software based tracking systems are in place at the site and corporate level that allow senior managers real time access to improvement and correction initiatives.

Fifteen of the seventeen Findings Requiring Action sub-sections from the 2011 report were accepted and addressed. Two Findings Requiring Action that were not completed. One concerns the development of a management system to promote Responsible Care by name and one concerns revisions to the management systems that reference code elements OP49-55 relating to Critical Infrastructure and Business Continuity.

Each CIAC member company is formally committed to the ethic of "*Doing the right thing, and being seen to do the right thing.*" This Ethic, along with the Principles for Sustainability is expected to guide the company's decision making and practices. In conducting the verification, the team is looking to understand how well the Ethic is understood and adopted within the company, and the degree to which the principles influences the manner in which the company conducts business.

The verification team carefully observed the Chemtura decision making processes contrasted the attributes of those with the attributes of a company guided by the Responsible Care Ethic and Principles for Sustainability as discussed in the Responsible Care Commitments booklet (Appendix E) and listed below. Team comments are highlighted in blue.

*1. work for the improvement of people's lives and the environment, while striving to do no harm;*
Chemtura has a very comprehensive management system to systematically review the raw materials and chemical manufacturing processes utilized to manufacture their products to fulfil the expectations of commitment number one. Functional systems such as the New Material Request Forms and risk assessments based on the Globally Harmonized System of hazard classification provide decision gates to ensure raw materials products and processes are not harmful to personal health or the environment and create value for society.

Chemtura, at the corporate level, has an objective to reduce energy intensity (measurable amounts) by 10% worldwide by 2025. View the 2015 Chemtura Social Responsibility Report at: www.chemtura.com/Pages/Sustainability.aspx

*2. be accountable and responsive to the public, especially our local communities, who have the right to understand the risks and benefits of what we do;*
It is a verification team consensus that Chemtura demonstrates a commitment to supporting these Principles with the corporate management philosophy and the daily operation of Chemtura Canada Co./Cie. While the corporate philosophy does support principle number two, legacy remediation issues at the Elmira site have in the past been the focus of the Community Dialogue Management System. Positive steps have been taken since the 2011 verification to revise the structure and focus of the Elmira Community Advisory Committee. The team has listed as a finding requiring action a need to expand the community dialogue focus in both the Elmira and West Hill communities beyond the activities of the respective community advisory committees.

*3. take preventative action to protect health and the environment;*
See note above.

*4. innovate for safer products and processes that conserve resources and provide enhanced value;*
See note above.

*5. engage with our business partners to ensure the stewardship and security of our products, services and raw materials throughout their life-cycles;*
There are corporate level management systems in place such as the Regulatory Management of Change management system that ensures accurate Material Safety Data Sheets are in-place with customers. New customer audits, audits of customers handling hazardous material and storage facility audits are examples of the functional aspects of the management systems. The described auditing processes is the "checking" function of the Plan, Do, Check and Act continual improvement management system.

### 6. understand and meet expectations for social responsibility;

Reference the appendices to the Responsible Care Codes- Social Responsibility. (page 12)

### 7. work with all stakeholders for public policy and standards that enhance sustainability, act to advance legal requirements and meet or exceed their letter and spirit;

Based on a review of both corporate and Canadian management systems, interviews with key Canadian managers, goal oriented improvement proclamations in corporate public documents and support for the goals and objectives of the CIAC it is a team consensus that Chemtura Canada Co. meets the expectations of commitment number seven.

### 8. promote awareness of Responsible Care, and inspire others to commit to these principles.

It is a verification team consensus that Chemtura demonstrates a commitment to supporting these Principles with the corporate management philosophy and the daily operation of Chemtura Canada Co./Cie. While the corporate philosophy does support principle number two, legacy remediation issues at the Elmira site have in the past been the focus of the Community Dialogue Management System. Positive steps have been taken since the 2011 verification to revise the structure and focus of the Elmira Community Advisory Committee. The team has listed as a finding requiring action a need to expand the community dialogue focus in both the Elmira and West Hill communities beyond the activities of the respective community advisory committees.

## VERIFICATION TEAM CONCLUSION

The verification team is of the opinion that the Responsible Care Ethic and Principles for Sustainability are guiding company decisions and actions, and that a self-healing management system is in place to drive continual improvement.  The team believes that the company is capable of responding to the range of Findings Requiring Action identified during the verification. The team would like to thank the management and employees of Chemtura for their hospitality, openness and cooperation during this verification. The verification is complete and no further involvement is required by the verification team.

## COMPANY RESPONSE TO VERIFICATION REPORT

On behalf of Chemtura Canada, I have reviewed this Verification Report. The observations and conclusions contained in the report have been discussed with the verification team.

I would like to thank the verification team for their time, effort and passion in preparing the report.   The verification audit was extremely helpful in providing us insights and opportunities for us to continually improve our processes and help us create greater transparency and accountability within the communities we operate.

Chemtura will communicate the results of the verification exercise with its CIAC peers at their next meeting, and will discuss the verification results with our stakeholders, including those representing communities near our sites.

We will give consideration to the Improvement Opportunities identified by the verification team and will assist the CIAC in communicating and sharing the identified Successful Practices to other CIAC members.  Plans will be developed and implemented to respond to the Findings Requiring Action identified by the verification team.  Our progress in implementing those plans will be discussed when preparing our Annual Statement of Re-Commitment to Responsible Care, and communicated to the verification team at the time of our next verification.

Helder Botelho
Hub Manufacturing Manager - Canada

Interview Lists

**A: Company Personnel Contacted During Verification Process**

| NAME | POSITION | LOCATION |
| --- | --- | --- |
| Helder Botelho | Hub Manufacturing Mgr., Canada | Elmira |
| Dwight Este | EHSS Area Manager, Canada | Elmira |
| Jeff Merriman | Environmental Remediation Mgr. | Elmira |
| Jeanette Waples | EHSSS Mgr. West Hill | West Hill |
| Darlene Stott | Safety Coordinator, Elmira | Elmira |
| Mei Schade | Mgr., Procurement Operations Canada | Elmira |
| Darren Bessey | Engineering& Maintenance Mgr. Canada | Elmira |
| Wendy Chin | Logistics & Planning Mgr., Canada | Elmira |
| Wendy Voralek | Environmental Services Supervisor, Elmira | Elmira |
| Geoff McISaac | Account Mgr., NAFTA Petroleum Additives Sales | Elmira |
| Ramin Ansari | Mgr., Environmental Affairs & Remediation. Global RC Coordinator | West Lafayette Indiana |
| Max Taytelbaum | Director, Regulatory Affairs | Philadelphia PA |
| Glen Neaves | Machinist/Mechanic | Elmira |
| Lesley Landoni | Senior Laboratory Technician | Elmira |
| Robert Wilson | Process Operator | Elmira |

**B: External Stakeholders Contacted During Verification Process**

| NAME | POSITION | LOCATION |
| --- | --- | --- |
| Allen Elias | Toronto East Community Advisory Panel member | West Hill |