

# Responsible Care® Verification Report

*Chemtrade Logistics Inc.*

August 13-14, 2019



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<sup>®</sup> 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 Chemtrade Logistics Inc. (Chemtrade). The verification was conducted on July 18, 2019 at Corporate Headquarters in Toronto, ON and on August 13, 2019 at North Vancouver, British Columbia and on August 14, 2019 at Fort Saskatchewan, Alberta.

This was the seventh verification of Chemtrade with the previous verification completed in July 2016.

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 stakeholder.

This verification is based on CIAC's "Guidance on Jointly Administrated Responsible Care Verification and Certification Exercises, March 2012" that is a protocol recognizing the following:

"A significant number of CIAC member companies and transportation partners are also members of the American Chemistry Council (ACC). Some of these companies have chosen to audit / certify their Canadian operations to the ACC-sanctioned Responsible Care Management System (RCMS) or RC14001 standards, in addition to the requirement to undertake CIAC's triennial Responsible Care verification process."

In following this protocol, this report highlights Chemtrade's Responsible Care® management systems relating to the Accountability Codes

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 Finding Requiring Action identified during the verification that is summarized below and discussed in detail in the report. The verification is complete, and no further involvement is required by the verification team.

Signed: \_\_\_\_\_ Date: Nov 10, 2019

**Gerry Whitcombe**  
Verification Team Leader

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

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## Summary of Verification Team Observations

As per the verification protocol, Findings Requiring Action must be addressed within three years unless otherwise noted. Improvement Opportunities must be reviewed and addressed. Justification is required for rejected improvement opportunities. Works in progress will be reviewed during the next verification. Successful Practices are potential improvement areas for other member companies.

### Findings Requiring Action:

It is a finding requiring action that a management system for the Accountability Code of practice must be implemented at all company locations, addressing its high-risk sites first within the 3-year verification period with a defined schedule to address all of its locations afterwards.

### Improvement Opportunities:

There is an opportunity for improvement to reconstitute the Accountability Code team to assist the company in achieving Accountability Code implementation.

There is an opportunity for improvement to provide corporate guidance to sites to facilitate the understanding of company commitment to the Accountability Code and the information and tools necessary to sustain it.

The company has been active in donating to local charitable causes and an opportunity exists for the CAP to provide advice to the company about its social responsibility program in the plant site community.

## 1. Introduction

### 1.1 About Responsible Care Verification

As a member of the Chemistry Industry Association of Canada (CIAC), the most senior executive responsible for Chemtrade's 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.

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

*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.

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

- 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;
- Identify opportunities for assisting the company when benchmarking its own practices and performance against those of its peers, thus supporting continual improvement;
- Contribute to the credibility of Responsible Care amongst company personnel and stakeholders, as well as the stakeholders of the broader industry;
- Identify successful company practices that can be promoted to peers in the CIAC membership; and
- 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 ([www.canadianchemistry.ca](http://www.canadianchemistry.ca)). Chemtrade 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](http://www.canadianchemistry.ca), or by contacting the Responsible Care staff at CIAC at [glaurin@canadianchemistry.ca](mailto:glaurin@canadianchemistry.ca) or 613 237 6215 extension 233.

### 1.2 About Chemtrade

This is a very brief overview of the company and its operations covered by the verification. Chemtrade Logistics was created in July 2001 and is a publicly traded Income fund on the Toronto Stock exchange. The company markets sulfur-based chemicals either produced or obtained under long-term removal and service agreements with by-product producers such as base metal smelters, oil refineries and industrial manufacturers. It produces sulfuric acid (H<sub>2</sub>SO<sub>4</sub>), liquid sulfur dioxide (SO<sub>2</sub>), sodium hydrosulphite (SHS - Na<sub>2</sub>S<sub>2</sub>O<sub>4</sub>), sodium chlorate (NaClO<sub>4</sub>), elemental sulfur (S), potassium chloride (KCl), phosphorus pentasulfide (P<sub>2</sub>S<sub>5</sub>), zinc oxide (ZnO) and inorganic coagulants for water treatment.

The company operates in 73 locations with six offices and four business segments: Acid & SPPC (Sulphur Products & Performance Chemicals), Water Chemicals, Specialty Chemicals, and Electrochem. In December of 2017, the company acquired Canexus and added four sites, enhancing its sodium chlorate and chloro-alkali business (Electrochem).

Attachment 3 provides a more detailed description of company operations.

### 1.3 About This Verification

The verification was conducted on July 18, 2019 at Corporate Headquarters in Toronto, ON and on August 13, 2019 at the chlor-alkali Electrochem facility in North Vancouver, British Columbia and on August 14, 2019 at the hydrogen sulphide SPPC facility in Fort Saskatchewan, Alberta. During the course of the verification, the team had the opportunity to interact with a range of company personnel, as well as stakeholders external to the company. Attachment 2 contains a list of those individuals interviewed and their affiliations.

This was the seventh verification of Chemtrade with the previous verification completed in July 2016.

The verification team was comprised of the following individuals.

Name	Affiliation	Representing
Gerry Whitcombe	CIAC Verifier	Industry (team leader)
Ron Ormson	CIAC Verifier	Public-At-Large
John Miller	Public Verifier	North Vancouver
Laurie Danielson	Public Verifier	Fort Saskatchewan

## 2. Team Observations Concerning the Responsible Care Commitments (Codes and benchmark and Collective Expectations)

This verification is based on CIAC's "Guidance on Jointly Administrated Responsible Care Verification and Certification Exercises, March 2012" that is a protocol recognizing the following:

"A significant number of CIAC member companies and transportation partners are also members of the American Chemistry Council (ACC). Some of these companies have chosen to audit / certify their Canadian operations to the ACC-sanctioned Responsible Care Management System (RCMS) or RC14001 standards, in addition to the requirement to undertake CIAC's triennial Responsible Care verification process."

In following this protocol this report highlights Chemtrade's Responsible Care® management systems and examines how the company is addressing the implementation expectations documented in the Accountability Code.

In communicating its observations, the verification team will make repeated reference to the following categories of observations:

1. **Findings Requiring Action** document instances where the verification team observes specific company actions (or the absence of company actions) which are inconsistent with the detailed codes and benchmark and collective expectations contained in the Responsible Care Commitments. Where possible, the verification team will communicate, based on their experience and judgment, why it is inconsistent and how the observation relates back to a possible gap in the expected management system and / or the ethic and principles underpinning company actions. The team may also provide advice on how the situation might be responded to.
2. **Works in Progress** document instances where the verification team has observed the company self-initiating actions in response to identified gaps and deficiency arising from other internal or external audit and review activities, or where the company has self-initiated important improvement opportunities.
3. **Successful Practices** document instances where the team believes the company has taken actions that strongly support sustained excellence in performance, and which should be communicated throughout the CIAC membership.
4. **Improvement opportunities** identify instances where the verification team has observed company actions and decision making as being largely consistent with the expectations detailed in the Responsible Care Commitments, but for which the team is of the opinion that the company could support further improvement by considering alternate or additional benchmarks when undertaking its planning and decision making.

The verification team's observations of how the company has addressed the Responsible Care Commitments are as follows:

### 2.1 Team Observations Concerning Operations Code

The company is certified to RC-14001 under 86125-2010-AE-USA-ANAB (draft) – RC 14001:2015

At the time of the verification, a Management System Certification audit was being conducted by the Company's RC14001 Registrar. Subsequently, the conclusions of that audit, among other things, indicate that:

- The management system has not been affected by company changes and was found to be effective and in compliance with the standard; and
- The Registrar will recommend Chemtrade for recertification.

Thirteen opportunities for improvement and four non-conformances were identified for action by the company and all non-conformances from the company's previous audit have been closed.

Based on the Registrar's report it is the team's opinion that the company's RC14001 management system sufficiently meets Responsible Care Operations Code implementation expectations.

Chemtrade aptly demonstrates its commitment to Responsible Care at the company's larger facilities and on a corporate basis. Despite this; however, the Registrar found the company to be challenged in its resourcing and management of acquired facilities and specifically that small sites lack the commitment and/or ability for community outreach that is a requirement under Responsible Care. This mirrors the verification team's findings which are discussed in this report.

## 2.2 Team Observations Concerning Accountability Code

### 2.2.1 Operating Site Communities (125-136)

The verification team interviewed headquarters personnel in Toronto Ontario and plant personnel in North Vancouver British Columbia and Fort Saskatchewan Alberta. The general topics for discussion centered on corporate direction and site implementation of the Responsible Care Accountability Code of Practice. In addition, the verification team held discussions with the Community Advisory Panel (CAP) associated with the North Vancouver operation.

The verification team continues to be impressed with the level of commitment shown by the company CEO and how Responsible Care has been integrated into its Board of Director's management approach. Notwithstanding the corporate commitment to Responsible Care, the verification team has observed that such commitment does not consistently remain a priority at the plant-site level. In part, this appears to be as a result of facility acquisitions that have left the implementation of the Accountability Code not well resourced

At the two sites that were visited, the company had good legacy programs for community outreach and engagement. Despite this, the verification team found that the company has not made measurable progress, as would be expected from corporate guidance, on an Accountability Code management system for all sites.

A principal reason for lack of better community outreach at its larger facilities is the company's decision to focus on higher risk sites for RC14001 implementation; and, on the inheritance of management systems previously in place at larger sites. Corporate guidance, management systems and implementation of the Accountability Code have been given relatively less attention and overall progress has been delayed.

#### ***North Vancouver***

The verification team met with plant personnel and observed that risk management efforts have resulted in reducing the amount of chlorine stored on site thus reducing the potential impact of a catastrophic release event. There is on-going, frequent communications with local emergency management personnel and CAP, but this has not extended to local neighbours with the exception of immediate businesses.

Community outreach tasks are entered into the company Compliance Calendar system but there is not a management system for the Accountability Code in place. This observation provides supporting evidence for the Finding Requiring Actions described in section 2.2.2 (below).

The team met with members of some local community associations and members of the company CAP (Community Advisory Panel). The CAP is mature, multi-company, and is externally facilitated.

As a result of his meeting several opportunities for the CAP will be brought forward at a future meeting and several items for consideration by the company were identified. These are:

**The company has been active in donating to local charitable causes and an opportunity exists for the CAP to provide advice to the company about its social responsibility program in the plant site community**

In general, the CAP, in its ongoing discussions, looks for new or better ways to reach out to the public in the local community to make them aware of the CAP and the chemical companies that are part of their community. This poses some challenges due to the fact that the main residential neighbourhoods lie approximately one-half kilometer away from the plant site; and, because interest in plant activities has typically been low except after process incidents or emergency alarms.

The CAP is developing (with cooperation from the company) a one-page document about shelter in place that will be provided to the North Vancouver District for general distribution.

However, the CAP has neither received information (at least recently) from the company about Responsible Care in general nor in particular as defined in the codes of practice. The former is a missed opportunity to 'Promote Responsible Care by Name' and the latter represents a failure in the company's Accountability Code management system to understand its responsibilities in dialoguing with the community. In addition, past company verifications have not been fully discussed or distributed to the CAP.

This observation provides supporting evidence for the Finding Requiring Action described in section 2.2.2 (below).

***Fort Saskatchewan***

The verification team met with plant personnel in Fort Saskatchewan and discussed community outreach. In addition, a telephone conversation was held Brenda Gheran, Executive Director of NRCAER (Northeast Region CAER).

The site, as is the case in North Vancouver, uses the company Compliance Calendar system to ensure outreach activities are scheduled and completed. Plant personnel have developed good relations with community emergency management personnel and are an active member of NRCAER and have recently completed a joint emergency response exercise.

A recent Life in the Heartland survey showed, with a 31% response rate, that 37% of respondents were aware of shelter in place. Given this low coverage and the City of Fort Saskatchewan's position that it will deliver emergency information to residents the company must adapt its outreach systems to reach as many residents as quickly as possible. This will involve continuing its involvement in NRCAER and enhancing its relationship with Life in the Heartland as well as other efforts (for example, Community Information Evenings hosted by Life In The Heartland).

However, there is not an Accountability Code management system in place to discover and facilitate these situations and this informs our Finding Requiring Action discussed later in 2.2.2.

### 2.2.2 Management System

The company has a very strong overall management system as is required under RC14001 and CIAC Responsible Care. In 2012 it published a corporate standard for Accountability Code management (CHE-ESH-RC-103, Chemtrade Accountability Code). This standard clearly defines implementation and management of the Accountability Code with structure, roles, responsibilities, interpretations, audit requirements, timing etc. governing the ongoing management of this code. The team did not find evidence that this standard has been implemented at the sites that were visited or that it has been maintained at corporate level. The standard was scheduled for review in 2015 but has not been updated since its release in 2012.

In 2016 an “Accountability Code Implementation Plan 2016 – Master” document was published covering the 26 sites operated by the company prior to the 2014 General Chemicals acquisition. This implementation plan has not been maintained.

During the period from 2014 to 2017 the company experienced rapid growth and a management decision was made to focus on risk-based implementation of RC14001. At the time of the last verification that risk-based approach to implementation of all requirements (ACC RC14001 and CIAC Accountability Code) was discussed and was deemed to be appropriate. However, it was assumed by the team that a timeline for implementation at all sites, based on risk, would be developed. It was further assumed that this timeline would be in accordance with CIAC guidelines which allow three years to bring acquisitions into conformance with requirements. The only implementation plan discovered by the team was the aforementioned 2016 plan, but it has not been updated and does not contain any newly acquired sites or any of the small sites.

Approximately five years have elapsed since the acquisition of General Chemicals. For those former General Chemical sites, the team did not see discernable progress with respect to the implementation of the Responsible Care Accountability Code. This clearly does not meet the intent or the spirit of Responsible Care.

Prior to the 2016 verification there was an active corporately sponsored Accountability Code Team charged with all aspects of companywide implementation. One of the important benefits of such a team is working through the details of acceptable programs to meet code requirements. It is the verification team’s understanding that this code team has not met since that verification. As a result, we recommend that it be reinstated to provide guidance and resources to plant-site facilities.

**It is a finding requiring action that a management system for the Accountability Code of practice must be implemented at all company locations, addressing its high-risk sites first within the 3-year verification period with a defined schedule to address all of its locations afterwards.**

**There is an opportunity for improvement to reconstitute the Accountability Code team to assist the company in achieving Accountability Code implementation.**

### 2.2.3 Corporate guidance

In the 2016 verification the company indicated that it was developing a corporate risk based guidance tool for community outreach. The idea, as we understood it, was to develop specific requirements based on risk and provide tools, information, training and guidance as to how site management could

meet company commitments. The guidance would be particularly directed towards the small sites where resources are limited. We continue to be of the opinion that this is the right direction for the company and also believe the more guidance provided by corporate in this area, the better. One particular tool provided by CIAC, the SCOPE measure, could easily be adapted to form the basis of such an approach.

Our observations at the two visited sites suggest that the programs in place have been inherited from past practices and are not formally part of a corporate-wide management system. Tasks to maintain the local plan are placed in the company's Compliance Calendar scheduling tool but apparently without an on-going management system for overall guidance. The verification team did not discover formal management review or continuous improvement as components of the Responsible Care management system. Our observations suggest that local management did not fully understand the company's commitment to the CIAC's Accountability Code. Moreover, it did not appear that plant-site officials would have an appropriate level of corporate guidance to assist them in meeting company commitments.

**There is an opportunity for improvement to provide corporate guidance to production site personnel to facilitate a better understanding of the company's commitment to the Accountability Code; and, the information and tools that are necessary to sustain that commitment.**

### 3. Team Observations on the Company Management System

It is a requirement of Responsible Care that companies have a documented, self-healing management system or systems capable of identifying and responding to deficiencies and otherwise supporting continual improvement across all company business units, functions, and sites and as a framework for implementing the Responsible Care Commitments.

The verification team assessed Chemtrade's Accountability Code management system(s) and compared and contrasted the attributes of that system(s) to those of a self-healing management system as discussed in the CIAC Management System Guide. It is the team's opinion that this management system contains all the attributes described therein.

Unfortunately, the management system has not been fully implemented and code requirements are largely managed ad-hoc or are the result of legacy programs at acquired facilities. Please refer to the discussion under 2.2 above.

## 5 Verification Team Conclusion

As a result of the examination conducted, and in consideration of the observations communicated within this report, 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 at a corporate level to drive continual improvement. The team believes that the company is capable of responding to the Finding Requiring Action identified during the verification - summarized above and discussed in detail in the report. The verification is complete, and no further involvement is required by the verification team.

## Company Response to Verification Team Report

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

Chemtrade 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 operating sites.

We will give consideration to the Improvement Opportunities identified by 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.

<b>Name</b>	Mark Davis
<b>Position</b>	President, CEO
<b>Company</b>	Chemtrade Logistics
<b>Date</b>	December 23, 2019

## Interview Lists

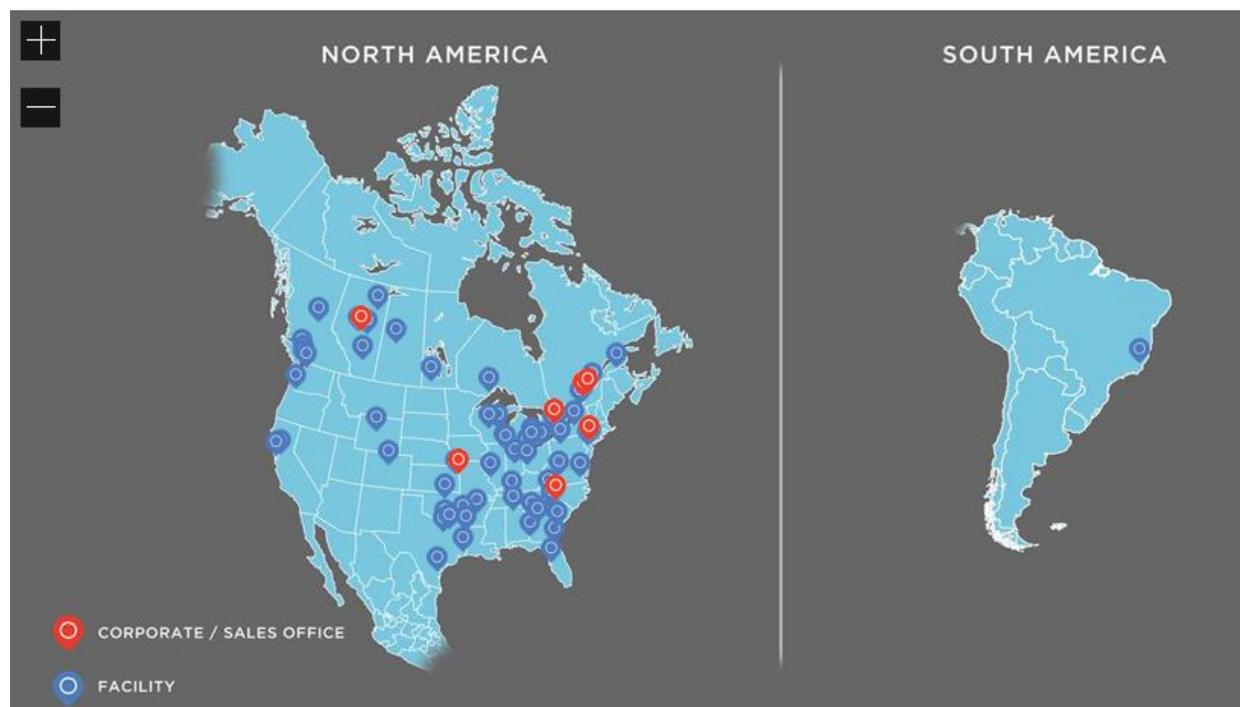
### A: Company Personnel Contacted During Verification Process

Name	Position	Location
Mark Davis	President & CEO	Head Office, ON
Jim Warren	Director, Health & Safety	Carlisle, SC
John Casisa	Corporate Responsible Care Manager	Huntersville, NC
Jennifer Lewis	Manager, Responsible Care & Quality	Calgary, AB
Tony Gutenberg	EHS Regional Manager	North Vancouver, BC
Hassan Halbouni	Plant Manager	Fort Saskatchewan, AB
Saminda Chandraratne	EHS Supervisor	Fort Saskatchewan, AB

### B: External Stakeholders

Name	Affiliation	Location
Dave Mair	CAP	North Vancouver
Stuart Porter-Hogan	(Maplewood Area Community Association)	North Vancouver
Sharon Porter	CAP	North Vancouver
Lisa Richardson	CAP	North Vancouver
Val Hammerberg	(Maplewood Area Community Association)	North Vancouver
Eric Godot Andersen	(Blueridge Community Association)	North Vancouver
John Miller	CAP and Verification Local Community Rep	North Vancouver
Brenda Gheran	Northeast Region CAER	Fort Saskatchewan

## Detailed Company Description



### Company Description

This is an overview of the company and its operations covered by the re-verification. Chemtrade Logistics was created in July 2001 and is a publicly traded Income fund on the Toronto Stock exchange. Chemtrade is one of North America's largest suppliers of sulfuric acid, spent acid processing services, inorganic coagulants for water treatment, sodium chlorate, sodium nitrite, sodium hydrosulfite and phosphorus pentasulfide. Chemtrade also supplies sulfur, chlor-alkali products, liquid sulfur dioxide, potassium chloride, and zinc oxide.

The company operates in 73 locations with six offices and four business segments: Acid & SPPC (Sulphur Products & Performance Chemicals), Water Chemicals, Specialty Chemicals, and Electrochem. In December of 2017 the company acquired Canexus and added four sites, enhancing its sodium chlorate and chloro-alkali business. This comprises the Electrochem business segment.

### Acid and Sulphur Products & Performance Chemicals (SPPC)

SPPC facilities typically regenerate spent sulfuric acid obtained from oil refineries, as well as a wide variety of sulfur-based products and services including Merchant, Regenerated and Ultra Pure Sulfuric Acid, Sodium Hydrosulfite, Elemental Sulphur, liquid Sulphur Dioxide, Hydrogen Sulfide, Sodium Bisulfite, and Sulfides. These products are marketed primarily to North American customers from facilities throughout the United States and Canada.

### Water Chemicals

These facilities manufacture and market a variety of inorganic coagulants used in water treatment, including aluminum sulfate, aluminum chlorohydrate, polyaluminum chloride, and ferric sulfate.

## Specialty Chemicals

These facilities manufacture a number of specialty chemicals, including sodium nitrite, potassium chloride, phosphorus pentasulfide, and vaccine adjuvants.

## Electrochem

Electrochem sites manufacture and market sodium chlorate and chlor-alkali products largely for the pulp and paper, oil and gas and water treatment industries.

## Facility Locations

Locations In Canada	Business
Anjou (Montreal), QC	Office
Beauharnois, QC	Electrochem
Brandon, MB	Electrochem
Burnaby, BC	Water Chemical
Calgary, AB	Water Chemical
Dalhousie, NB	Water Chemical
Edmonton, AB	Water Chemical
Ft. McMurray, AB	SPPC
Ft. Saskatchewan CSC, AB	Water Chemical
Ft. Saskatchewan Sulfides, AB	SPPC
Nellie Lake (Iroquois Falls), ON	Water Chemical
Niagara Falls, ON	SPPC
North Vancouver, BC	Electrochem
Prince George Acid, BC	SPPC
Prince George Chlorate, BC	Electrochem
Saskatoon, SK	Water Chemical
St. Augustin, QC	Water Chemical
Thorold, ON	Water Chemical
Thunder Bay, ON	Water Chemical
Toronto, ON	Office
Trois Rivières, QC	Office
Valleyfield, QC	Water Chemical

Locations In US	Business
Anacortes, WA	SPPC
Ashdown, AR	Water Chemical
Atlanta, GA	Water Chemical
Augusta, GA - Water	Water Chemical
Bay Point, CA Alum	Water Chemical
Beaumont, TX	SPPC
Berkeley Hts., NJ	Specialty
Cairo, OH	SPPC
Catawba, SC	Water Chemical
Cedar Springs, GA	Water Chemical
Charlotte, NC	Office
Celina, TX	Water Chemical
Chicago, IL	SPPC
Cleveland, OH	SPPC
Covington, VA	Water Chemical

Decatur, AL	Water Chemical
Denver, CO	Water Chemical
East St. Louis, IL	Water Chemical
Hopewell, VA	Water Chemical
Indianapolis, IN	Water Chemical
Jacksonville, FL	Water Chemical
Johnsonburg, PA	Water Chemical
Lawrence, KS	Specialty
Leeds, SC	Water Chemical
Macon, GA	Water Chemical
Menasha, WI	Water Chemical
Middletown, OH	Water Chemical
Midlothian, TX	Specialty
Mt. Vernon, WA	SPPC
Newark, NJ	Water Chemical
Odem, TX	Water Chemical
Overland Park, KS	Office
Parsippany, NJ	Office
Pine Bluff, AR	Water Chemical
Port St. Joe, FL	Water Chemical
Richmond, CA	SPPC
River Rouge (Detroit), MI	Water Chemical
Riverton, WY	SPPC
Savannah, GA	Water Chemical
Shreveport, LA	SPPC
Springfield, TN	Water Chemical
Syracuse, NY	Specialty
Tampa, FL	Water Chemical
Terrell, TX	Water Chemical
Toledo Acid, OH	SPPC
Toledo Water, OH	Water Chemical
Tulsa, OK	SPPC
Vancouver, WA	Water Chemical
Whiting, IN	SPPC
Wisconsin Rapids, WI	Water Chemical

<b>Locations In Brazil</b>	<b>Business</b>
Brazil (Espirito Santo), BR	Electrochem





**Responsible Care<sup>®</sup>**  
Our commitment to sustainability.

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