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# RESPONSIBLE CARE®

## VERIFICATION REPORT

### NORFALCO SALES INC.

*February 1<sup>st</sup> and 2<sup>nd</sup>, 2011*

#### Disclaimer

This report has been produced by a team, convened by the Chemistry Industry Association of Canada (CIAC) to provide advice to the above company and assist it in meeting its Responsible Care commitments as a member of the Association. The material in it 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 which is the subject of this report to interpret and act on the findings and recommendations in this guidance document 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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Our commitment to sustainability.



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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 NorFalco Sales Inc. The verification was undertaken on February 1<sup>st</sup> and 2<sup>nd</sup>, 2011 and included a team visit to company Canadian headquarters located in Mississauga, Ontario. The verification team also conducted telephone interviews with external stakeholders at locations the team was unable to visit. This was the fifth Responsible Care verification completed for NorFalco. The last verification was completed in November, 2007.

While considering all aspects of the Responsible Care Commitments during this verification the team placed an emphasis on conducting an in-depth examination of company aspects related to the 2009 Responsible Care Protocol:

- Overall Responsible Care Management System
- Response to Incidents and Concerns
- Performance Measures
- Process Safety Management
- Product Stewardship
- Site Security and Emergency Response
- Environmental Management
- Visibility and Employee Awareness of Responsible Care
- Occupational Health and Safety
- Transportation Security
- Risk Communication
- Social Responsibility
- TransCAER outreach
- Carrier Selection
- Engagement of Elected Officials
- Community Outreach and Dialogue

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 NorFalco 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 - summarized below and discussed in detail in the report. The verification is complete and no further involvement is required by the verification team.

Signed: Gerry Whitcombe    Date: May 24, 2011  
Verification Team Leader

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

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# 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 NorFalco's operations in Canada attests annually to CIAC and its peers that the NorFalco'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 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.

As an element of this commitment to Responsible Care, NorFalco 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 NorFalco's facilities are located.

Once completed, the Verification Report is made publicly available through the CIAC website ([www.canadianchemistry.ca](http://www.canadianchemistry.ca)). NorFalco 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)292-8663 extension 233.

## 1.2 About NorFalco Sales Inc.

NorFalco Sales Inc. is a subsidiary of NorFalco Inc. itself a subsidiary of the Xstrata-Zinc Division of Xstrata PLC. NorFalco Inc. is headquartered in Cleveland Ohio and the Canadian subsidiary in Mississauga, Ontario. There are 16 employees in Canada, 24 in the United States.

The company's sole business is the marketing and distribution of sulfuric acid, primarily obtained from Xstrata's Canadian metal refining facilities. The company contracts rail, truck and marine transportation services and also contracts terminal services for storage and transloading from rail to truck. The company has no physical assets.

The company makes approximately 15,000 rail tank car shipments annually via a dedicated fleet of 1,900 leased tank cars; 16,000 truck shipments annually via contracted carriers and a network of contracted terminals and infrequent marine chemical parcel tanker shipments.

For more information about NorFalco please visit their web site at:  
<http://www.norfalco.com/>

### 1.3 About This Verification

The verification of NorFalco was conducted on February 1 and 2, 2011 and included team visits to company headquarters located in Mississauga, Ontario. The verification team also conducted interviews by phone with other external stakeholders at locations the team was unable to visit. Attachment 2 contains a list of those individuals interviewed and their affiliations.

This was the fifth verification exercise completed for NorFalco. The last verification was completed in November, 2007.

The verification team was comprised of the following individuals.

- Gerry Whitcombe      Team Leader
- Claude Bourbon        Industry verifier
- David Powell          Public-At-Large Verifier

## 2. TEAM OBSERVATIONS CONCERNING THE RESPONSIBLE CARE COMMITMENTS (CODES AND BENCHMARK AND COLLECTIVE EXPECTATIONS)

During the verification of NorFalco, the verification team looked for evidence that the company was addressing the expectations documented in the new 2010 Responsible Care Commitments (152 code elements plus 28 benchmark and collective expectations). While considering all areas of the Responsible Care Commitments during the verification, the team placed an emphasis on conducting a more in-depth examination of certain company activities related to the 2009 Responsible Care Protocol:

- Overall Responsible Care Management System
- Response to Incidents and Concerns
- Performance Measures
- Process Safety Management
- Product Stewardship
- Site Security and Emergency Response
- Environmental Management
- Visibility and Employee Awareness of Responsible Care
- Occupational Health and Safety
- Transportation Security
- Risk Communication
- Social Responsibility
- TransCAER outreach
- Carrier Selection
- Engagement of Elected Officials
- Community Outreach and Dialogue

The team also reviewed the gap analysis done by the company between practice-in-place and the above mentioned requirements for the new codes and has commented where it has obtained appropriate information.

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 NorFalco actions (or the absence of NorFalco 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 NorFalco 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 NorFalco self-initiating actions in response to identified gaps and deficiency arising from other internal or external audit and review activities, or where the NorFalco has self-initiated important improvement opportunities.
3. **Successful Practices** document instances where the team believes the NorFalco 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 NorFalco 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 NorFalco 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 NorFalco has addressed the Responsible Care Commitments are as follows:

## 2.1 Team Observations Concerning Operations Code

The company does not have any physical assets and as a result very little of this code applies to them directly. However, as a marketing and distribution company they contract third parties to operate distribution terminals on their behalf. This requires that the company ensures the third party "meet the same applicable expectations of Responsible Care as the company would if it was performing those activities itself" (ref ST116). In this context the company should assess the requirements of the Operations Code in support of and to assess the third party activity and performance.

With this in mind, it is the team's observation that the Codes of Practice apply to the company as follows:

### Operations Code

- Certain code elements apply to all company employees - office, sales and technical (e.g. Occupational Health and Safety, Critical Infrastructure/Business Continuity, Incident Reporting and Investigation etc.)
- Specific code elements apply to carriers (e.g. Transportation and Physical Distribution and the second part of Emergency Management)
- Most code elements apply to terminal operations (e.g. Process Safety Management, etc.)

### Stewardship Code

- Principal applicable code for the company
- ST116 drives the Operations Code requirement listed as the third bullet above

### Accountability Code

- Applicable as appropriate

The company, as required, has conducted an analysis to determine the gaps between the requirements, as specified in the new Codes of Practice, and the company's internal policies, standards, guidelines and practices. In reviewing this cross reference the team believes the company has identified the broad areas where company standards, guidelines and/or procedures (company systems) cover code requirements and has identified the gaps which require further work. However, some code elements are covered by the same list of company systems (and in one case by two systems which are listed as 'spare' in the index document). It is the team's view that as the company further develops this cross reference they should do so ensuring that the references become much more specific as to where, specifically, in company systems each code requirement is covered.

There is an Opportunity for Improvement with the cross reference that matches company systems with code requirements to review the applicability of Responsible Care requirements and ensure, where possible, references are specific enough to be audited.

### **2.1.1 Design and Construction of Facilities and Equipment**

In this code section the team reviewed how the company selects and approves terminal operators and inaugurates terminal operations and concludes that the company has sound design criteria for these facilities.

### **2.1.2 Operations Activities**

The team reviewed all elements of the Transportation and Physical Distribution sub-section of this code section and generally found implementation to be exceeding expectations.

The company has well documented requirements for carriers to perform route risk assessments and for follow up by company personnel. Terminals are located where there are multiple points of access and the expectation is that the route risk assessment has determined the most appropriate option.

There is an improvement opportunity in 5.0 (Truck Transportation Risk Management) and 5.31 (Route Risk Assessment Guidelines) to confirm the carrier has selected the most appropriate option for arriving at or departing the terminal property.

### **2.1.3 Safety and Security**

Here the team reviewed the second part of the “Emergency Management” section which pertains to transportation emergency management and generally found that the company meets implementation expectations.

### **2.1.6 Promotion of Responsible Care by Name**

The company generally promotes Responsible Care by name and most staff recognizes the name and logo. The team is of the opinion that implementation meets expectations.

## **2.2 Team Observations Concerning Stewardship Code**

It is the team’s opinion that this is where the bulk of the company’s implementation to meet its commitment to Responsible Care resides.

The team reviewed some of the first section, “Expectations of Companies “, and most of the second section, “Expectations of Companies with Respect to Other Parties”.

### **2.2.1 Expectations of Companies**

The company does not undertake research and thus “Research and Development Expectations” does not apply.

The following are comments related to “Expectations Beyond R&D”.

The team agrees with the company's assessment of which sub-sections apply except that we believe the "Raw Materials, Product and Services Characterization and Evaluation" sub-section also applies. A perspective on applicability is suggested in the following opportunity.

There is an Improvement Opportunity to include discussion of social, economic and environmental benefit of NorFalco's marketing of what is a waste product as a very useful industrial chemical on website, in literature, etc. – that is, link it to sustainability. The story for Xstrata's Sustainable Development Report is a good base for this (ST93).

In the sub-section on "Promotion of Responsible Care by Name" the team was given examples demonstrating that all levels of company employees promote the brand. The fact that the President has as a personal goal the engagement of customers in Responsible Care discussions is noteworthy.

The personal commitment of the company President in bringing the message about Responsible Care to customers is a "Successful Practice" (ST101).

In this section the team found implementation generally meets expectations with the exception noted above. The team encourages the company to review its gap analysis of the first sub-section.

### **2.2.2 Expectations with Respect to Other Parties**

The team reviewed all sub-sections of this component of the Stewardship Code and recognizes that a major portion of company compliance to its Responsible Care commitment resides here.

In general terms the team is of the opinion that the company exceeds expectations in the implementation of the requirements outlined in this section.

As mentioned earlier code element ST116 requires a company to "meet the same applicable expectations of Responsible Care as the company would if it was performing those activities itself". The team concludes that team observations with respect to contracted terminals, such as: orientation on Responsible Care for a terminal manager, understanding the impacts from neighbouring facilities on a terminal and a proactive approach to understanding waste handling as a result of washings are indicative of management system weaknesses and are addressed in Section 3 of this report.

Element ST123 encourages companies to "Proactively look for opportunities to share information...". The company excels at this and the team would like to recognize three successful practices that set industry benchmarks and demonstrate the company's dedication.

The "NorFalco Product Stewardship Program and Seminars" encompassing free training seminars, safety videos, site visits and technical material for both NorFalco's customers and for the customers of NorFalco's distributors, is a Successful Practice.

The complimentary web-based sulfuric acid training program is a Successful Practice.

The company's web-site providing access to safety information, material properties, company videos, MSDSs and a product handbook is a Successful Practice.

## **2.3 Team Observations Concerning Accountability Code**

The team reviewed implementation opposite the Operating Site Communities section and opposite the Transportation Corridor sub-section of the Other Stakeholders section.

### **2.3.1 Operating Site Communities**

The team found that the requirements for community dialogue were well documented but not as well implemented or understood by the terminals. We view this as a management system finding and have described it in Section 3.

It is the opinion of the team that the company has some work to do in this area to meet implementation expectations.

### **2.3.2 Other Stakeholders**

The team reviewed the “Transportation Corridor” section and observed that the company currently provides the co-chair for the Ontario Region TransCAER committee.

It is the team’s opinion that for this sub-section implementation of code requirements exceed expectations.

## **3. TEAM OBSERVATIONS ON THE NORFALCO 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 and functions and as a framework for implementing the Responsible Care Commitments.

The verification team studied NorFalco’s management system(s) and compared and contrasted the attributes of that system(s) to those of a self-healing overall management system as discussed in the CIAC Management System Guide.

The company is a marketing and distributing company and as such they do not have physical assets other than office facilities and product in transit or at terminals. Notwithstanding this the company has embraced Responsible Care in its very effective implementation of the Stewardship Code, the principal applicable code of practice for this business model.

The company has developed and documented an excellent management system (“Risk Management Guidelines for Sulfuric Acid Distribution). Key to setting direction is the “NorFalco Sustainability and Responsible Care Policy” which clearly integrates the drivers of its parent company, Xstrata, with its commitment to Responsible Care.

In the team’s opinion, the mapping of Responsible Care requirements to the company’s management system generally exceeds expectations for comprehensiveness and implementation.

The verification team’s related observations to the NorFalco management system(s) are as follows:

### 3.1 Observations on the PLAN Step

During the PLAN Step of the management system, the company decides what the goals of the company are and how they will be met. In determining those goals, it is expected the company will look inward, across its operations, but will also look outward, considering the expectations of: stakeholders; regulatory requirements; relevant CIAC Responsible Care Commitments and supporting tools; and other industry benchmarks.

In considering the PLAN Step of NorFalco's management system, the verification team observed the following:

The company has demonstrated innovation in the benchmarking of normal practices for its business niche through the use of a customer survey in which questions pertaining to industry norms are asked. The context is that of a value added service but the results are a snapshot indicating where this industry segment is heading opposite some specific Responsible Care topics.

The team recognizes that the company has considered including the Fluorspar division within the commitment to Responsible Care. We also recognize this is an on-going exercise and encourage a positive outcome for this Work In Progress.

The company has designed and implemented sound planning processes and has demonstrated engagement throughout the organization. The team is of the opinion that implementation of the PLAN step fully meets expectations.

### 3.2 Observations on the DO Step

During the Do Step in the management system, the company converts the decisions of the PLAN Step into action and ensures awareness and understanding by all involved. It is expected that the company will implement an organizational structure, assign responsibilities to appropriate personnel, supply sufficient training and resources to execute planned actions and develop and document standards, procedures and programs, as applicable.

In considering the DO Step of NorFalco's management system, the verification team observed the following:

The company is very small in terms of the number of employees, therefore all management is involved on an on-going basis and most meetings will incorporate some aspect of continuous improvement in Responsible Care.

The Risk and Technical Services group has been formally assigned to steward Responsible Care within the company and they are the principal resource for stewardship with stakeholders. The technical requirements for doing business are set out in formal contracts and it is this group that has effectively mapped these requirements for handling and transporting sulfuric acid by all modes and at terminals into usable standards. It is also this group that provides the technical information, training and support to all stakeholders in the chain.

The team reviewed the company's terminal management system and while it generally exceeded our expectations for implementation there are some deficiencies that suggest the

company should carefully review code requirements and modify the management system to incorporate the findings. Some examples of the deficiencies are:

- Under previous requirements contained in section 2.2 of the Distribution Code of Practice (and currently under element ST116, OP7d, OP31) when dealing with the “storage and handling of chemicals and chemical products whether on owned or contracted premises”, the company must “monitor its safety and health performance as well as the working environment with the objective of identifying and minimizing actual or potential occupational safety and health problems”. One aspect of this requirement is that the company should review surrounding industries and plan for potential impact on the operation by potential external emergencies.
- The team discovered that actions relating to community dialogue were not being carried out. Two examples of these were: Local Emergency Planning Committees (LEPCs) were being used as the vehicle for community dialogue but no follow up was done to ensure that the nature of the risk and what to do in an emergency were actually communicated and the Philadelphia terminal had not yet done its risk communication to local commercial neighbours

There is a finding requiring action that the company review its terminal management system in light of, but not limited to, the guidance in the report to ensure all Responsible Care code aspects are properly understood and incorporated.

The company has extensive interactions with its terminals including various visits and formal audits and the team observes there are some improvements possible in the dissemination of information.

There is an Opportunity for Improvement to the management system for terminals to expand the audience of site visit summaries that detail suggested modifications to include the terminal operator contract holder.

The team was made aware that carriers and tank car owners are responsible for handling all wastes generated from the washings of the trailers and tank cars under the assumption that regulations are being met. Under Stewardship Code element ST121 the requirement is to advocate that all other parties apply the waste management expectations of the Operations Code to their operations.

There is an Improvement Opportunity to ensure the management systems for carriers and tank car owners adequately includes and reflects the requirements from the Operations Code related to waste handling (OP64-75)) as directed in ST121.

The team observed that winter driving was a significant factor in the working environment of company employees and presents the following opportunity.

There is an opportunity for improvement to investigate the development of a company policy on winter tires for employees.

The involvement of the Risk and Technical Services group with stakeholders is key in allowing the company to meet its commitment to Responsible Care. Notwithstanding the observations above the team has no hesitation in saying implementation of the DO step exceeds expectations.

### 3.3 Observations on the CHECK Step

During the CHECK Step in the management system, actions carried out in the DO Step are assessed to determine if they are actually being carried out according to plan, and whether they are achieving the desired outcomes and delivering continual improvement. Here, the overall management system and components will be reviewed along with employee competences for assigned responsibilities, internal and external audits will be undertaken, incidents will be assessed to identify root causes, and performance measurement will be conducted and reviewed.

In considering the Check Step of NorFalco's management system, the verification team observed the following:

The company continually reviews actions opposite plans and effectively applies continuous improvement to its operations. They routinely audit service providers and ensure physical visits occur on a regular and routine basis. In all of this the company has met the team's expectations for implementation of the CHECK step but has exceeded our expectations in their innovative and thorough monitoring and follow-through of stakeholder incidents.

### 3.4 Observations on the ACT Step

During the ACT Step in the management system, the company translates the results of the CHECK Step into corrective actions for improvement. This includes revisiting the PLAN Step to decide whether changes are need to the company's stated goals or action plans, policies and procedures for achieving those goals. Considerations when examining the Act Step include whether and how: audit and review findings are responded to; performance is communicated internally and externally; employee and contractor performance is rewarded and corrected, etc.

In considering the Act Step of NorFalco's management system, the verification team observed the following:

The company effectively responds to various inputs about its operations and one example of performance in this area is demonstrated by the recognition it receives through various carrier safe shipping awards. In turn the company recognizes its motor carriers for their performance through its Motor Carrier Performance Award program.

The company's Motor Carrier Performance Award program is a Successful Practice.

The ongoing review of the status of Responsible Care elements by the Technical Services group presents an opportunity for the company in the annual sign-off to CIAC on Responsible Care:

Annually the company's Risk and Technical Services group reviews compliance to Responsible Care through the cross-reference document. With the implementation of the new codes there is an Opportunity for Improvement to formalize this process and include it in the President's attestation process.

The company has met the team's expectation in implementation of the Act step.

#### 4. TEAM OBSERVATIONS ON THE RESPONSIBLE CARE ETHIC AND PRINCIPLES FOR SUSTAINABILITY

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 are 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 inform the manner in which the company does its business.

The verification team carefully observed NorFalco’s decision making processes and actions and compared and 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 (Appendix E). The verification team’s related observations on the company’s application of the *Responsible Care Ethic and Principles for Sustainability* are as follows:

The team believes all eight principles for sustainability were demonstrated during the team’s two days of on-site interviews as well as the one day planning and orientation meeting. Some were more strongly visible than others but with ethic driving continuous improvement the team has no doubt that the company is heading in the right direction.

The very strong commitment to Product Stewardship as embodied in the “Delivering More than H<sub>2</sub>SO<sub>4</sub>” program demonstrates how the ethic is driving the company.

#### 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 NorFalco decisions and actions, and that a self-healing management system is in place to drive continual improvement. The team believes that the NorFalco is capable of responding to the range of Findings Requiring Action identified during the verification, as summarized in the Executive Summary and discussed in detail in the report. The verification is complete and no further involvement is required by the verification team.

## ATTACHMENT 1: NORFALCO RESPONSE TO VERIFICATION TEAM REPORT

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

NorFalco 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. Since we don't have operating sites, we will post on our website.

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.

Tom Hobbs  
Director, Risk Management & Technical Services  
NorFalco Sales Inc.  
June 27, 2011

## ATTACHMENT 2: INTERVIEW LISTS

### A: NorFalco and Third Party Personnel Contacted During Verification Process

Name	Position	Location
Paul Shaw	President	Cleveland, OH
Tom Hobbs	Director, Risk & Technical Services	Cleveland, OH
Seay Harder	Director, Sales & Marketing	Mississauga
Geoff Cowell	Director, Distribution	Mississauga
Mary-France Rollin	Technical Representative	Montreal
Scott King	Technical Manager, U.S.	Cleveland, OH
Eric Kuraitis	Technical Representative	Mississauga
Michelle (Gus) Auberzinsky	Savage, Terminal Manager	Pittsburgh, PA
Randy Gifford	Savage, Regional Manager.	Elizabeth, NJ
Henry Fajardo	Savage, Terminal Manager	Elizabeth, NJ
Mark Scena	Transflo, Contract Rep.	Elizabeth, NJ