

August 3, 1999.

Rohm and Haas Canada Inc.
2 Manse Road
West Hill, Ontario M1E 3T9

cc. Gordon Crooks
David Powell
Jim Wakefield
Harvey Mead
Brian Wastle

Attention: Jim Hanna
Manager, Product Integrity

Dear Jim,

Enclosed is a copy and disk of the final Verification Report, which documents the findings of the Verification Team following the meeting at the West Hill site on March 1-2, 1999.

This final report includes all the comments, corrections and suggested improvements as expressed by Rohm and Haas and members of the Verification Team.

I apologize for the delay in finalizing this report, but as you are well aware, this was a test of the Re-Verification Protocol, which has been under constant revision and review. This had an impact on this report format.

On behalf of the Verification Team, I would like to congratulate Rohm and Haas for having met the requirements for the Re-Verification with the few exceptions as noted in the report.

The Verification team is confident due to the strong overall ethic and management systems of the company, that the root causes of all "significant findings" will be addressed by the company and lead in a timely way to full Responsible Care® in Place. Therefore, there is no requirement for team follow-up.

The numerous suggested "opportunities for improvement" cited in this report, do not require team follow-up, but in some cases follow-up with the Leadership Group, Community Advisory Panel and/or others may be appropriate.

The company has to be congratulated for the commitment and high standard it has set with respect to Responsible Care®.

The Verification Team would like to thank all the employees of Rohm and Haas for their wonderful hospitality and wish continuing success with their Responsible Care® program.

Sincerely,

Robert Scott
Team Leader on behalf of the Verification Team

The Canadian Chemical Producers' Association



Responsible Care[®]: A Total Commitment

Re-Verification

for

Rohm and Haas Canada Inc.

March 1 – 2, 1999.

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The Canadian Chemical Producers' Association

DISCLAIMER

This document has been produced by a team convened by The Canadian Chemical Producers' Association (CCPA) to provide guidance to the above company, as a member of the association, in meeting its obligations under Responsible Care[®]. Although CCPA members are expected to share the results of this guidance with interested parties, neither the association, its member companies, their employees, consultants and other participants in this study accept any responsibility whatsoever for consequences resulting from its use or application. It is the responsibility of the CCPA member company which is the subject of this report to interpret

and act on the findings and recommendations as it sees fit, and any member company, organization or person using this document does so at their own risk.

Compliance Verification:

EXECUTIVE SUMMARY

The Responsible Care® compliance re-verification for Rohm and Haas Canada Inc. was conducted on March 1-2, 1999.

The verification was based on a detailed visit to their West Hill, Ontario site. Information was gained from interviews, document reviews, a site inspection and subsequent interviews with external stakeholders. The verification was conducted by a three member team appointed by the Canadian Chemical Producers' Association and scrutinized by a local community representative selected by the Rohm and Haas Canada Inc. Community Advisory Panel.

The team used the questioning approach described in the Draft 8 Compliance Re-Verification Protocol. The questions focused on and tested for the existence of efficient management systems to ensure understanding of Responsible Care® and the attainment of the desired level of performance, documentation and benchmarking to adequate standards.

Based on its investigation, the Verification Team is in agreement that Rohm and Haas Canada Inc. has done an excellent job in meeting the expectations and guidelines to achieve re-verification compliance.

An outstanding strength continues to be the company's commitment to the ethics of Responsible Care®. The West Hill operation in particular, appears to be very confident in, and proud of, its adherence to Responsible Care®. As a result, they have always opened themselves up to close scrutiny and extensive communication to all external stakeholders and their own employees.

The company's active participation, and in many cases, leadership roles in numerous C.C.P.A. and other committees support their Responsible Care® objectives.

Performance measures in support of Responsible Care® are comprised of both internal and external reporting mechanisms, a number of which are included in their "Total Quality Leadership" performance measurement.

The addition of the Corporate Product Stewardship Management System and ISO 14001 Certification of the West Hill operation have added to and reinforced the company's Responsible Care® efforts.

They have also in place the necessary auditing and review processes.

Effective systems are in place and appear to be well designed and implemented, enabling the company to meet and sustain the desired level of performance with on-going provisions for continuous improvement. It ensures that Rohm and Haas Canada Inc. can continue to put measures in place for the effective management of chemicals, products, and processes in the environment of changing knowledge, regulations and most importantly, public expectations.

The company has demonstrated that it has effectively addressed nearly all the concerns, suggestions and recommendations raised in the initial verification and has shared the results with the local community.

However, the Verification Team made a few significant findings ‘S.F.’ that are not fully implemented (Responsible Care® in Place) level which are highlighted (in bold italics) throughout the report. While these findings are not serious enough to require team reassessment, follow-up will be required through the CCPA’s CEO recommitment submission, Leadership Group and the Community Advisory Process.

Best Practices ‘B.P.’ and aspects the company should consider as “opportunities for improvement” ‘O’* are highlighted throughout the report.

Rohm and Haas has done an excellent job in meeting and, in many cases, exceeding the requirements for re-verification. They are a role model for the industry.

This report focuses on the issues where the Verification Team felt certain areas needed strengthening and/or improvement to meet the expectations set out by the CCPA. For further details, readers of this report may want to refer to the excellent and extensive advance documentation by Rohm and Haas to the re-verification requirements.

R.I. Scott
Verification Team Leader

August 1999

INTRODUCTION

This report contains the findings and recommendations of the Verification Team. The verification was based on a two (2) day visit to the Toronto (West Hill), Ontario site. Information was gained from interviews with the company managers and employees, document reviews, a site inspection and interviews with external stakeholders. The verification was conducted by a four-member team, including three appointed by the Canadian Chemical Producers' Association (C.C.P.A.) and a local community representative selected by the company's public advisory panel.

The Verification Team conducted the re-verification according to the developed "Draft 8" protocol.

Observers were present to view the test run of the protocol.

The members of the Verification Team, Observers and Key Contacts during the process are listed in the Appendix.

Aspects showing significant improvement and Best Practices are denoted by 'B.P.'.

Aspects that are "significant findings" 'S.F.' requiring further work and follow-up with the Community, Leadership Group and CCPA via the Annual CEO recommitment report are highlighted in bold italics.

Aspects the company should consider as "opportunities for improvement" are denoted by 'O'*.

OBJECTIVE

Each member of the CCPA must commit to the guiding principles and codes of practice of Responsible Care®, as a condition of membership in the association.

The re-verification protocol was developed by the Associations' members and others to confirm, for the Canadian Chemical Producers' Association peers and the public, the existence of satisfactory management systems which ensures that the guiding principles and codes of practice of Responsible Care® are in place and practiced within the organization. It is a process required of all Responsible Care® companies for publicly verifying that Rohm and Haas Canada's Management Processes, verified initially, are still in place or improved upon and, are producing acceptable performance improvement in areas important to itself and its community and other various stakeholders.

It should be noted here that 'completion' of verification does not indicate that nothing further needs to be done, but rather that a key milestone has been reached in a process of continuous improvement.

VERIFICATION CRITERIA

The following are the terms of reference for the re-verification by which Rohm and Haas was evaluated.

Management Systems Verification

1. Continues to have effective management systems to meet the Responsible Care® principles and codes as established in the initial (Responsible Care® in Place) verification [while member companies are expected to maintain management systems for all codes, the areas of particular focus will include TransCAER outreach, route risk assessment, carrier evaluations, process risk assessment and communications, process safety management and product stewardship, plus other code elements identified by the CCPA and the Verification Team]:
2. Has demonstrated that it has effectively addressed all concerns, suggestions and recommendation raised in the initial verification and has shared the results of this verification with the local community.
3. Has adequately addressed significant issues and incidents that have arisen since the initial verification.

Continuous Improvement and Best Practices

4. Has as part of its management systems processes, including performance indicators, to ensure continuous improvement in its performance; Critical areas include emission and waste reduction (NERM), Occupational Health and Safety (SHARE), transportation incidents (TIM), process-related incidents, product stewardship, stakeholder involvement and other priority areas identified by the member company and C.C.P.A.
5. Has identified, through an effective and proactive public dialogue process, priority areas of concern and has established effective methods, targets and timelines for addressing these concerns; and
6. Has demonstrated significant improvement in performance in at least the priority areas of concern.

ASSESSMENTS

1. Responsible Care® in Place

The company has addressed the requirements and recommendations following receipt of the Responsible Care® in Place Verification Report. Progress since the formal response in 1996 was highlighted throughout the re-verification information package.

Rohm and Haas has shared it appropriately with the community and has responded to any community concerns and requests for information.

As soon as an individual web site is available on the corporate external web, Rohm and Haas Canada will post reports. The target is sometime this year (1999).

In December 1997, the West Hill site was part of an internal Business Tailored Management System Verification (B.T.M.S.V.). The subsequent report was also shared with the community. This is another illustration of the site's proactivity in sharing relevant information with interested and concerned external stakeholders.

2. Rohm and Haas Canada Inc.

Rohm and Haas Canada Inc. is a wholly owned subsidiary of the Rohm and Haas Company whose headquarters are located in Philadelphia, PA. USA.

Worldwide, the company has \$4.0 billion annual sales, 10,000 employees, 40 manufacturing sites and 12 research and technical sites.

The company's expertise is in acrylic polymer design, electronic materials and is one of the world's largest suppliers of specialty chemicals.

The company has only one operating site in Canada which is located in East Toronto (West Hill) which produces about 111 grades of acrylic polymer emulsions and has about 154 employees. Close to the plant, the company has a distribution warehouse for all Rohm and Haas Products sold in Canada.

Rohm and Haas Company have established that all global business divisions within the organization will comply with the standards and ethics of Responsible Care®. The same standard applies when doing business in countries where there is presently no Responsible Care® initiative.

It was agreed upon between the Verification Team and the company, that the detailed re-verification would take place at their site located at 2 Manse Road (West Hill) in Toronto, Ontario on March 1st and 2nd, 1999.

The Rohm and Haas Company has adopted Responsible Care® throughout the organization and all geographical locations.

While there has been no change in ownership since the Responsible Care® in Place Verification in 1995, there has been a major change in its structure. The company is now organized into three major business groups centralized from the worldwide headquarters in Philadelphia. Each group is divided into four regions. The West Hill site is part of the North American region and as such all key personnel report directly to managers in Philadelphia.

Rohm and Haas Canada still remains a legal entity with Bob Valgardson as President. All other operations and sales functions report directly to United States personnel.

The restructuring resulted in several position changes and personnel holding key positions in Responsible Care®. However, the replacements came from within the company and this has assured good Responsible Care® continuity.

Rohm and Haas has a Performance Management Process which is incorporated within the Company's "Total Quality Leadership" (TQL). The company requires annual performance targets in all areas of the business and includes the ongoing commitment to Responsible Care®.

Since the initial Verification in 1995, Rohm and Haas has closed its Plexiglas operation in Morrisburg Ontario and has sold the remaining Plexiglas business to Elf Atochem. The remaining oil additive business in Morrisburg was sold to Rohmax.

The plasticized business at West Hill was also sold and the equipment dismantled. This greatly reduced site risk and increased safety to employees and the community. The company also installed a new storage and handling system of acrylonitrile, the most hazardous chemical at the West Hill site, which again resulted in further decreased risk to employees and the neighbourhood. The company has also constructed a separate freestanding flammable storage warehouse for flammable materials.

The company also rents a warehouse on Coronation Drive in West Hill for distribution of products, most of which are for resale from its parent company. It is one of four distribution centres for packaged goods in North America and the only one in Canada.

The West Hill plant continues to manufacture water-based emulsions. The final products at West Hill are classified as non-hazardous. The raw materials are hazardous since they are all inhibited reactive monomers.

The finished products are mostly shipped out by bulk truck, 15% by railcar and 15% by drums or totes. 50% of shipments are exported with the majority going to the United States. It should be noted that the company brings in their raw materials – classed as hazardous- by rail. Their products are shipped by truck.

The ethic of Responsible Care® remains strong within Rohm and Haas Canada despite the restructuring. The management changes have had little effect on the day to day operation of the company.

Rohm and Haas U.S.A. went under the full Chemical Manufacturing Association (C.M.A.) audit process for Responsible Care® at the end of 1996. This has all reinforced the efforts and commitment in Canada.

3. Company Changes

The major change in the West Hill operation appears to be in the organizational structure. The plant operations are now more directly controlled by the Corporate entity in the U.S. One might expect this change to affect the nature of Responsible Care®, either by lessening the commitment to Responsible Care® or by having it driven more by the C.M.A. precepts than by the C.C.P.A. One can see the current emphasis on Product Stewardship (a positive development) as evidence of the latter.

The observation was that the plant management has remained as highly committed to the principles of C.C.P.A. Responsible Care® as before. In fact, throughout the two-day session the verification team gained confidence that Responsible Care® continues to be practiced at all levels of the organization and that it permeates all relevant operations and practices. Further evidence showed that Responsible Care® was supported and driven from the CEO down through the Rohm and Haas organization. Staff changes and downsizing have had no adverse effect on Responsible Care®. Its importance to the organization is evidenced by its inclusion in the T.Q.L. process, the company's major performance reporting system, and in the West Hill Plant Operating Policy.

The description of changes within the company since the Phase I Verification was comprehensive and met the needs of the Verification Team.

4. Community Changes

The company was very descriptive and comprehensive in documenting changes that have occurred in the local community. The most noteworthy was the amalgamation of six cities to form the Toronto "Mega" City. While the amalgamation has had very little apparent impact on Regional Services like the Police, Municipal Services like the Fire Services continue to adjust to changes within the organization.

Rohm and Haas has to be commended for hosting the first Joint Emergency Response Simulation on September 13, 1998 (Operations Genesis) which was extremely successful.

5. Description of Communities and Dialogue Needs

The description of the community was comprehensive and met the needs of the Verification Team.

The process for defining the community, and the community dialogue and outreach processes, and the processes for responding to community concerns are comprehensive and appropriate to the site and its risk profile.

The West Hill Management Team has been proactive in this area, showing leadership in the West Hill CAER group, developing a working Community Advisory Panel and planning and conducting community “town hall” type meetings. The CAP has been used significantly to improve the content and delivery of information at these meetings. Since Phase I, the community dialogue area has been expanded. Continuing efforts to expand the CAP to include more of the area’s chemical producing/handling organizations are to be applauded.

“S.F” There is a weakness in the benchmarking of this management system. There is still a “gap” because the dialogue area does not extend as far as the ERPG3 guideline for the plant’s worst case scenario, let alone the larger area that would be impacted in some way by the worst case scenario. Given the apparent risk profile of the facility, and the fact that dispersion modeling has not yet been done for the other chemicals on the site which might cause off-site impacts from an incident, the decision to confine community outreach and risk communication to within one mile of the facility needs to be revisited and discussed with the CAP.

“S.F” To date they have made no concentrated effort for one-on-one contacts with nearby residents as they said they would do in their Phase I follow-up. There needs to be an additional effort to communicate face to face with the close-in neighbours on the worst and most credible case scenarios along with “what to do” in an emergency.

Several neighbours who live relatively close to the plant, either in the Grey Abbey Trail area or just to the north, all agreed that Rohm and Haas does a good job of responding to concerns, and of being open to the community at meetings, but there was, in some cases, only a vague understanding of what to do in an emergency. All of them had taken the initiative to attend meetings, open houses, et cetera. They spoke about the occasional odour problems, the frequency of which has gone way down over the years. These odours, however, have made the plant visible to the nearer neighbours, and have raised some concerns.

Those neighbours, who have not taken the initiative to use the opportunities to dialogue with the site, do not know what the plant is making and the associated risks. Fears exist concerning the Health Risk to children from possible emissions due to a perceived high incidence of cancer on Grey Abbey Trail.

All of this reinforces the necessity of Rohm and Haas proactively going out to the nearer neighbours and ensuring that they know what the plant does, what it emits, what are the range of risks it poses to the community, and what to do in an emergency. The geographic extent of this effort should be guided by the risk profile and those who are aware of the odours, and discussed with the C.A.P.

There are also opportunities in the following elements of the Management System.

- ‘O’* In the interim, there is the opportunity to discuss with the CAP the possibility of including residents on the North side of Lawrence Avenue and on up to Kingston Road in the Outreach and Dialogue Process.
- ‘O’* It appears that despite best efforts, attendance at the twice-annual community meetings continues to be a disappointment. Management and the CAP should continue to search for ways to increase attendance or develop viable alternatives. Exposure through the media, inclusion of local politicians and Scarborough Health personnel and a wider dialogue area are some methods to be explored.
- ‘O’* Rohm and Haas needs to ensure that there is a solid vision and effective plan for ongoing dialogue with all segments of interested external stakeholders and then develop a means of measuring its effectiveness. The planned statistical survey of the dialogue area by the experienced Roper organization may be a good start and provide directions to improving the dialogue process. The Community Advisory Panel could assist them in developing this.

- ‘O’* Detailed minutes of community meetings should continue to be taken and used to identify further information needs in the community, It is suggested that in those cases where a clear answer cannot be given to a question raised at the community meeting, the individual should be identified and a written reply provided at a subsequent date.
- ‘O’* It is recommended that some form of summarized data from the incident list be shared with the community. This would serve to illustrate the company’s interest in its impact on the community as well as highlight its efforts to address and mitigate that impact. The use of the incident list should not be reactive in nature.
- ‘O’* Through careful analysis, management may develop preventative processes as well. As an example, it appears that truck traffic in the community is high on the list of community concerns. Since many vehicles are now fitted with very detailed computer logs, a random sample of truck speeds through the dialogue area could be a very effective tool to reduce concerns about excessive vehicle speeds.
- ‘O’* While the meeting with the Community reinforced the team’s positive sense of the outreach activities, the Community meeting minutes were of concern. Many of the answers were vague to Community’s questions and in some cases where they talked of surveys, were wrong.
- ‘O’* An opportunity exists for the company to ensure that speakers’ presentations are fully understandable to the Community and the CAP. As an example, the Medical Doctor brought up from the Parent Corporation was too technical, vague and not very comprehensible to the panel.
- ‘O’* An opportunity exists to track the concerns of the broader community through a link to the Scarborough Community Council.

6. Conformance Processes

The Verification Team was impressed with the Rohm and Haas Management and the fact that the ethic of Responsible Care® is still well entrenched at the West Hill site. The conformance processes for Responsible Care®, including changes to management systems in response to changes within the company and in the community, are in general very comprehensive and well documented.

The company obtained ISO 14001 Certification in 1997 and their goal is to have all their Safety, Health and Security Procedures on the ISO format by the end of 1999. However, the company tends to use the ISO system as a Responsible Care® audit process. ISO is an excellent document formation, filing and control system and should be used as such.

‘S.F.’ A Plan needs to be put in place to ensure that all activity completed for Responsible Care® by the ISO audit system or other internal review, is cross-referenced to the appropriate policies, standards and procedures in its documentation system. Policies, standards and procedures should be cross-referenced back to the appropriate code elements. A full Responsible Care® internal audit and review with all Code Coordinators present should be made annually to check the performance of the system and activities.

‘O’* There is an opportunity to test the awareness of the knowledge of Responsible Care® by employees more regularly. This could be done in the biannual employee surveys and/or through the periodic administration of a Responsible Care® quiz similar to the one done in 1997.

7. Issues, Incidents and Concerns

The West Hill operation has a number of mechanisms to report, investigate and follow up on incidents and concerns related to Health, Environment and Safety. One such example is the Incident/Suggestion Report (ISR). Feedback and documentation are required and encouraged from employees, carriers and customers. Feedback is also encouraged from the community and a high priority is placed on a quick response. Management appears to have utilized this feedback to make corrections and improvements to their processes.

The documentation of issues, incidents and concerns supplied to the Verification Team was very comprehensive, and the company's responses to these reflected the Responsible Care® ethic, as did changes made to processes and procedures.

'O'* There is an opportunity here to act and use the ISR in a proactive manner to implement preventative measures in managing risk at the plant.

8. Performance Measures

The company has an impressive range of performance measures, both outcome and activity based, which are benchmarked against good industry performance practices, and tracked in terms of performance and performance improvement. Performance data are shared with appropriate stakeholders within and outside the company, and the company has processes to respond to the concerns of stakeholders with this performance. Safety, Health and Environment measures are particularly good.

'O' * There is an opportunity to implement a process to periodically review the need for new performance metrics to check to ensure that the system is delivering required measurements of performance.

9. C.C.P.A. Requested Areas of Team Focus

a. TransCAER

Work has been slow in the areas of route risk assessment and TransCAER. The latter has largely been out of management's direct control, involving as it does other companies and community organizations, and the re-awakening of the TransCAER group.

'O'* Management should take a leadership role in advancing the process and they now appear to be in a position to do this in the GTA. They should leverage this influence to take a leadership position in promoting this code across Canada.

b. Route Risk Assessments

The processes for Route Risk Assessment are comprehensive. The company has purchased very safe railcars and was the biggest contributor to a mobile decontamination unit for the GTA.

The introduction of new software (Riskmap) should facilitate the route risk assessment process. Other planned software may help reduce transportation risk by eliminating redundant traffic.

'B.P.' The company has gone an extra step by extending route risk assessment to supplier shipments as well as hazardous raw materials.

'O'* There is an opportunity to be proactive on the issue of putting a 4-way stop sign or traffic signals at the intersection of Manse and Coronation, and for addressing traffic concerns at the intersection of Kingston and Manse.

c. Carrier Evaluation

Ongoing carrier evaluations are a valuable tool to ensure product and raw materials are transported safely. These evaluations are a continuing process, and appear to be effectively administered. We were told of one carrier recently being removed from bulk transportation as a result of unsatisfactory carrier activity. Comprehensive carrier evaluation processes are in place.

'O'* There is an opportunity to spot-check the speed logs of carriers, given the concerns of the community with speeding trucks on residential streets around the site.

d. **Process Risk Assessment**

The company has good processes for process risk assessment. However, on-going required M.A.P.P. studies since Phase I Verification have been put on hold pending Corporate new improved procedures and better utilization of global resources. While understandable, the Team was disconcerted and viewed it unacceptable that the West Hill site had not followed up on their Phase I submitted plan to gain compliance. M.A.P.P. studies should have continued under existing procedures until replaced by the new process.

‘S.F.’ The company must DO and complete the dispersion modelling for those chemicals which could have an off-site impact.

e. **Risk Communications**

Rohm and Haas Management have been leaders in the West Hill CAER group in forming the Community Advisory Panel and leading the community meetings. The processes for risk communication are generally in place.

‘S.F.’ The company must implement and carry out a process to ensure that all near neighbours who are at immediate risk from an incident know the risks posed to them by the company, and know what to do in an emergency. (The geographical boundaries of this should be determined once the dispersion modelling is completed for all chemicals on site that can have an off-site impact from an incident. The company can get an initial estimate of this from the RNP’s being done in June in the U.S.)

The company also needs to implement a process to spot-check that the rest of the community that can be affected by an incident at the site knows what to do in an emergency.

Once the dispersion modelling is complete, the company should plan to revisit and check the geographic area within which it should be communicating risk, and ensure that its risk communication processes include the risks from these other chemicals.

‘O’* There is an opportunity to do this spot-check proactively with the launch of the new siren system, and in the Roper community survey that is being carried out for the site.

f. **Process Safety Management**

The company has implemented a number of proactive measures in the area of emergency prevention, including a new and improved storage facility for acrylonitrile, a separate, isolated building for storage of flammable materials and the use of special, top loading rail cars.

Comprehensive processes for Process Safety Management, including the addressing of gaps, are in place.

g. **Product Stewardship**

‘B.P.’ Recognition of the value of Product Stewardship (PS) as a code in the U.S. has led to its adoption as a concept in the Canadian operation. The Product Stewardship program operated from Corporate Head office is well integrated with the West Hill site and is well ingrained throughout the business process at Rohm and Haas. Since Product Stewardship includes aspects of all six C.C.P.A. codes, adherence to the Product Stewardship principles will have a very positive influence on the practice of Responsible Care® at the West Hill site. As evidenced at the panel discussion, the Product Stewardship effort is being led at Corporate by a very competent and knowledgeable person. There appear to be numerous effective control systems in place to address Safety, Health and Environment concerns throughout the product life cycle.

The processes for Product Stewardship are excellent for all second parties. Of particular excellence is: (1) the fact that the company tracks where all of its products end up in secondary manufacturing, and will not sell its products for use in manufacturing certain end-use products which it find unacceptable from a Product Stewardship perspective, and (2) the fact that suppliers who do not return a self-assessment form are audited.

‘S.F.’ The one weakness in Product Stewardship is that the company, in its marketing, uses two brochures published almost 10 years ago by the Crop Protection Institute of Canada, that make claims about the negative impacts on food production yield of not using crop protection products that may oversimplify the issue and misrepresent the extent of these potential impacts, and, therefore, as such, could be misleading and alarmist. A third brochure has a deprecating tone in its depiction of organic agriculture. Rohm and Haas should check and act that this marketing material is up-to-date, accurate and detailed enough to avoid misleading the reader, and that it reflects the ethic of Responsible Care® in its content and tone.

h. Emergency Response

Comprehensive processes for testing the site and the community Emergency Response plan are in place.

Requirements with respect to ensuring that members of the community know what to do in an emergency are addressed in 9. e) above.

Emergency Response drills are regularly scheduled at the plant. In addition, a large scale Emergency Response test operation was held late in 1998 and involved all first responders. The test proved to be very valuable and further similar tests are planned. Rohm and Haas leadership in procuring a decontamination unit for the Greater Toronto Area illustrates the company's proactive participation in Emergency Response. In addition, the company, in partnership with the West Hill CAER group, plans to introduce a siren warning system, and publish appropriate public response procedures.

Representatives from both the Fire and Police Departments were very pleased with Rohm and Haas' efforts in emergency response, both internally and in working with them.

i. Historical Waste Sites

There are none of concern.

j. On-site Contractor Selection

There is a process in place to keep records of incidents involving on-site contractors so that these will be reviewed in selecting contractors for future work.

1. Company-Requested Areas for Team Focus

The requested areas were examined thoroughly by the Team, and appropriate comments and recommendation made in 1 to 9 above.

2. Interviewees

Comments are included in 1 – 9 above.

3. Life-Cycle Impacts

‘B.P.’ The company has shown leadership in the consideration of life-cycle impacts for its products and operations through its Product Stewardship Program.

In discussion with the Corporate Product Stewardship Manager, it is evident that the company currently cannot really look into Upstream-Research on such things as Endocrine-disrupters. However it was stated that as part of Responsible Care® and Good Life-Cycle Management, some products will look a lot different when and if the concerns about these disrupters come to the forefront and are validated.

THE CCPA VERIFICATION TEAM

	<i>Affiliation</i>	<i>Representing</i>
Robert Scott Team Leader	Consultant Retired Hercules Canada Responsible Care® Coordinator	Industry
Gordon Crooks	Consultant Retired Bayer A.G. Responsible Care® Coordinator	Industry
David Powell	Environmental Management Consultant	Public at large
James Wakefield	Consultant Member of Community Advisory Panel	Community
<u>Observers</u>		
Harvey Mead	Consultant	Public at large
Rick Darling	Rohmax Canada	

Key Contacts during the process:

Rohm and Haas Responsible Care Team	
Bob Valgardson	President -Rohm and Haas Canada
Roger Hayward	Vice President – Plant Manager
Steve Fryzvk	Sales Manager Coatings - Distribution Code Manager
John Kolff	Manufacturing Manager – Manufacturing Code Manager
Dale Stevenson	S.H.E. Manager
Ron Layton	Management Systems Coordinator
Jim Hanna	Regulatory Affairs Manager – Responsible Care® & CAER Code Coordinator
Lisa Kard	Safety and Environmental Coordinator – Waste Code Manager
Arnie Payment	Purchasing Manager
Tina Burghardt	Customs & Logistics Specialist – TransCAER Coordinator
Dorothy Corpus	Regulatory Specialist
Kathleen Maher	Leader Product Stewardship – Product Integrity Department – Philadelphia
Robert Neuman	Product Safety Manager – Polymer, Resins, and Monomers – Philadelphia

The team also contacted several suppliers, carriers, contractors, a representative of both the local Fire and Police Departments, and selected members of the community, including an evening meeting with the company’s Community Advisory Panel.