

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY FOR METALS for 2015

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the *Toxics Reduction Act* and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation (O.Reg.) 455/09.

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number for the Substance(s) whose Toxic Substance Reduction Plans are summarized by this this Plan Summary	This Plan Summary applies to the Toxic Substance Reduction Plans for the following prescribed Toxic Substances: Chromium, Manganese, Nickel (Per O.Reg.455/09; "no single CAS numbers apply to these substances")
National Pollutant Release Inventory (NPRI) and O.Reg.127/01 Identification Numbers	NPRI ID: 29772 O.Reg. 127/01 ID: N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	DECAST Ltd. 8807 County Road 56 Utopia, Ontario L0M1T0 Canada
The number of full time employee equivalents at the facility	498
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	32 – Manufacturing 3273 – Cement and concrete product manufacturing 327330 – Concrete pipe, brick and block manufacturing
Public contact	Bruce Parrinder Manager, Environmental Health & Safety/Human Resources DECAST Ltd. [address per above] (705) 734-2892
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	UTM Zone 17 594127 E, 4910051 N
Parent Company Information	TACC Group 270 Chrislea Road Woodbridge, ON L4L 8A8 (905) 856-8500

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Chromium*
Manganese*
Nickel*
Particulate Matter*
PM10*
PM2.5*

*Per O.Reg.455/09, "no single CAS numbers apply to these substances"

Statement of Intent

As required by s.4(1) of the TRA, a Plan must include either a statement of the Facility's intent to reduce the use and/or creation of the Toxic Substance at the Facility, or the reasons for not including this statement.

A statement of the Facility's intent to reduce its "use" of the Toxic Substance has not been included as a part of this Plan. The Toxic Substance is never created within the Facility's process and therefore no statement with respect to intent to reduce creation of the Toxic Substance is required.

The Facility is captured by the requirements of the TRA pertaining to the Toxic Substance since the Facility meets the TRA's definition of target facilities "with North American Industry Classification System codes commencing with the digits 31-33 (manufacturing)" and also triggered the Toxic Substance's TRA reporting threshold, which was adopted by the TRA from National Pollutant Release Inventory (NPRI).

Per guidance pertaining to the Toxic Substance, reporting is triggered if the Toxic Substance was "manufactured, processed, or otherwise used" (MPO) in the previous calendar year in an amount that is greater than a specified quantity. The activity that has been classified as a "use" of the Toxic Substance is the use of the following raw materials which contain the Toxic Substance:

- mild steel
- stainless steel
- steel shot/grit; and
- welding rods.

The Toxic Substance's "use"-based reporting threshold was exceeded due to the large quantity of raw materials containing toxic substances that passes through the facility and is manufactured into finished products each year.

As a result, and in accordance with the TRA, this specified quantity has been reported to the MOECC as a "use" of the Toxic Substance as a part of a mandatory Toxic Substance quantification, accounting and reporting exercise.

This document satisfies the additional TRA requirement of Toxic Substance Reduction Plan preparation, which requires the Facility to systematically examine opportunities to reduce its "use" of the Toxic Substance. Unlike tracking, accounting, reporting and preparation of a Toxic Substance Reduction Plan which are all requirements; the implementation toxic substance reduction options identified in the Plan (if any) is not a requirement of the TRA or O.Reg.455/09.

The Toxic Substance is contained within the structure of the above raw materials and is considered integral to the desired physical properties of the raw materials. Therefore, the Facility is of the opinion that there are no opportunities to reduce the use of the Toxic Substance without reducing Facility production.

As a part of fulfilling its requirements under the TRA and O.Reg.455/09, the Facility has prepared a total of three Toxic Substance Reduction Plans and Plan Summaries for metals contained in steel which are prescribed toxic substances and whose “use” cannot be reduced based on the factors presented above.

The MOECC has stated that the TRA is not intended to focus on “end of pipe” emissions as they don’t necessarily have any bearing on the amount of a substance that is “used” or “created”.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the Plan are as follows:

- provide support for the Facility’s position with respect to the Statement of Intent by providing an explanation of how the TRA’s definition of the word “use”, as applied to the Toxic Substance, renders it impossible to reduce the “use” of the Toxic Substance without reducing Facility production;
- provide the reader with an understanding of the nature of the Facility activity which the TRA has defined as a “use” of the Toxic Substance; and
- document how the Facility has fulfilled the applicable requirements under the TRA and O.Reg.455/09 with respect to the Toxic Substance.

Description of Why the Toxic Substance Is Used or Created

As stated elsewhere in this Plan, the Facility activity that the MOECC has defined for the purpose of the TRA as a “use” of the Toxic Substance is the handling and processing of metallic raw materials in which the Toxic Substance occurs as an article component and is integral to the function and performance of the material. The Facility manufactures a variety of pre-cast concrete products such as pipes, tunnels and bridge girders, which require welded steel rebar, cages and steel mesh forms to provide structure and strength to the final products. Therefore, it is impossible to reduce this “use” of the Toxic Substance without reducing the Facility’s production. The Toxic Substance simply travels through the Facility process without undergoing any significant chemical change. It is impossible for the Toxic Substance to be created within the Facility process, since the Toxic Substance is reportable under the TRA and O.Reg.455/09 as an article component of the raw materials.

Rationale for Not Implementing Toxic Substance Reduction Options

As required by s.18(4) of O.Reg.455/09 (as amended by s.9(3) of O.Reg.214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories.

Therefore, the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified.

Statement that the Plan Summary Accurately Reflects the Current Version of the Plan

As required by s.24(1)8 of O.Reg.455/09 this Plan Summary accurately reflects the current version of the Plan.

Planner License Number

As required by s.18(2) of O.Reg.455/09 (as amended by s. 9(2) of O.Reg.214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan is as follows:

James McEvoy
Air Quality Specialist
Golder Associates Ltd.
Toxic Substance Reduction Planner License Number TSRP0288

Copies of the Confirmation

Confirmation statements are provided in the following page.

June 26, 2018

Project No. 1893705

Bruce Parrinder, Manager, EH&S/HR
DECAST Ltd.

**LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CONFIRMATION STATEMENT FOR TOXIC
SUBSTANCE REDUCTION PLANS FOR DECAST LTD. UTOPIA FACILITY**

Dear Mr. Parrinder

Golder Associates Ltd. (Golder) was retained by the DECAST Ltd. facility located at 8807 County Road 56 in Utopia, Ontario to provide various services pertaining to Toxic Substance Reduction Plan preparation under the *Toxics Reduction Act* (TRA), including Toxic Substance Reduction Planner (Planner) confirmation of Toxic Substance Reduction Plan (the Plans).

Following TRA guidance, in circumstances where a Plan is prepared after the date prescribed in s.11.1 of Ontario Regulation (O.Reg.) 455/09, a Planner "Confirmation Statement" is to be provided in place of the corresponding Certification Statement prescribed in s.19 of O.Reg.455/09. The following Confirmation Statement satisfies this requirement. Furthermore, the following Confirmation Statement is limited to the respective version of the Plan which is dated as indicated in the Confirmation Statement:

As of June 26, 2018, I, James McEvoy, certify that I am familiar with the processes at the DECAST Ltd. Utopia Facility that use the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the Toxics Reduction Act, 2009 that are set out in the toxic substance reduction plan referred to below for the toxic substance and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act, with the exception of section 11.1.

- Chromium (dated June 19, 2018);
- Manganese (date June 19, 2018);
- Nickel (dated June 19, 2018);
- Particulate Matter (dated June 19, 2018);
- PM₁₀ (dated June 19, 2018);
- PM_{2.5} (dated June 19, 2018).



James McEvoy, P.Eng.

Toxic Substance Reduction Planner

License No. TSRP0288

BSF/JDM/NCJ/ng

[https://golderassociates.sharepoint.com/sites/1893705/technical work/tra plans/confirmation statements/1893705 decast tra planner confirmation.docx](https://golderassociates.sharepoint.com/sites/1893705/technical%20work/tra%20plans/confirmation%20statements/1893705%20decast%20tra%20planner%20confirmation.docx)

Toxic Substance Reduction Plans Confirmation by Highest Ranking Employee

As required by s.4(2) of the *Toxics Reduction Act* (TRA), Toxic Substance Reduction Plans must contain a certification, signed by the highest ranking employee (HRE) at the Facility who has management responsibilities relating to the Facility. As per TRA guidance, if a Toxic Substance Reduction Plan is completed after the date prescribed in s.11.1 of Ontario Regulation (O. Reg.) 455/09, a rationale must be provided by the HRE which explains the reason that the Plan was completed after the prescribed date. Also following TRA guidance, a "Confirmation Statement" is being provided in place of the corresponding Certification Statement prescribed in s.19 of O. Reg. 455/09.

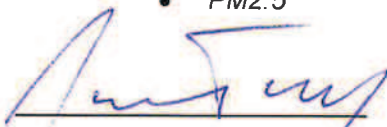
The following statement, made on behalf of the HRE, satisfies the requirement for a written rationale for completing the Toxic Substance Reduction Plan listed below after the date prescribed in s.11.1 of O. Reg. 455/09:

The Toxic Substance Reduction Plans subject to this Confirmation Statement had not been completed in accordance with s.11.1 of O. Reg. 455/09 as it has been prepared after the deadline outlined in O. Reg. 455/09 of December 31, 2016. This plan could not be submitted due to a lack of resources and expertise at the Facility.

The following Confirmation Statement satisfies the requirements of s.4(2) of the TRA for the Toxic Substance Plans that are assembled within this single document, with the exception of s.11.1 of O.Reg.455/09. Furthermore, the following Confirmation Statement is limited to the respective versions of the Plans which are dated as indicated in the Confirmation Statement:

As of June 19, 2018,, I, Jim Tully, P.Eng., Executive Vice President, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act, with the exception of section 11.1.

- Chromium (dated June 19, 2018)
- Manganese (dated June 19, 2018)
- Nickel (dated June 19, 2018)
- Particulate Matter (dated June 19, 2018)
- PM10 (dated June 19, 2018)
- PM2.5 (dated June 19, 2018)



Jim Tully
Executive VP
DECAST Ltd.

June 19, 2018

Date