

REPORT ON TOXIC SUBSTANCE REDUCTION PLANS (2018 Reporting Year)

This Report on Toxic Substance Reduction Plans has been prepared in accordance with, and satisfies the requirements of, Section 10 of the *Toxics Reduction Act* (TRA) and Section 27 of Ontario Regulation (O.Reg.) 455/09 for the TRA toxic substances for which Toxic Substance Reduction Plans have been prepared to date.

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This Report on Toxic Substance Reduction Plans 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”) and Particulate Matter, PM10, PM2.5 (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	462
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 and 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*
PM-10*
PM-2.5*

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

Toxic Substance Accounting Information

Refer to Appendix A: TRA Toxic Substance Quantification and Accounting Summary for the information required under s.12(1) of O.Reg.455/09.

Comparison of Toxic Substance Accounting to the Previous Calendar Year

Refer to Appendix B: Comparison of Toxic Substance Quantification and Accounting to the Previous Calendar Year for the information required by s.26(2) of O.Reg.455/09.

Changes in Quantification Methods

There were no changes made to any quantification methods since the preparation of the Toxic Substance accounting information for the previous calendar year and therefore no changes outlined in the above comparison occurred due to changes in quantification methods.

Objectives of Toxic Substance Reduction Plans

Refer to Appendix C: Toxic Substance Reduction Plan Summaries for the objectives of the respective Toxic Substance Reduction Plans covered by this Report, as required by s.26(2)3 of O.Reg. 455/09.

Toxic Substance Reduction Options Identified in Toxic Substance Reduction Plans

As outlined in the Plan Summaries attached in Appendix C, no toxic substance reduction options were identified in any of the respective Plans and therefore the information required by s.26(2)4, s.26(2)5 and s.26(2)6 is not applicable for this Report.

Amendments to Toxic Substance Reduction Plans

On April 18, 2019, the Ministry of the Environment, Conservation and Parks announced a Regulation Decision Notice on the Environmental Registry of Ontario (ERO number 013-4235) which indicated that facilities are no longer required to review existing plans.

No Amendments have been made to the Toxic Substance Reduction Plans.

Certification Statement

As of June 4, 2019, I certify that I have read the Report on the toxic substance reduction plans for the substances listed below and am familiar with its content and to my knowledge the information contained in the Report is factually accurate and the Report complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

Chromium*

Manganese*

Nickel*

Particulate Matter*

PM-10*

PM-2.5*

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

JIM TOLLY, EXECUTIVE VICE PRESIDENT

Name and Position


Signature

June 4, 2019
date

APPENDIX A: TRA TOXIC SUBSTANCE QUANTIFICATION AND ACCOUNTING SUMMARY

TRA Toxic Substance Quantification and Accounting Summary

TRA Reportable Substance	CAS*	Public Reportable Values (Report to Public)			
		Unit	Use	Creation	Contained in Product
Chromium	N/A-4	tonnes	>10 to 100	—	>10 to 100
Manganese	N/A-9	tonnes	>10 to 100	—	>1 to 10
Nickel	N/A-10	tonnes	>10 to 100	—	>10 to 100
PM - Particulate Matter	N/A-M08	tonnes	—	>10 to 100	—
PM10 - Particulate Matter <=10 Micrometers	N/A-M09	tonnes	—	>10 to 100	—
PM2.5 - Particulate Matter <=2.5 Micrometers	N/A-M10	tonnes	—	>1 to 10	—

Notes:

* Substances with CAS Numbers starting with "N/A" do not have CAS Numbers in NPRI or TRA guidance. The CAS Numbers assigned to those substances are arbitrary CAS Numbers used for the purpose of this workbook.

**APPENDIX B: COMPARISON OF TOXIC SUBSTANCE QUANTIFICATION AND ACCOUNTING TO
THE PREVIOUS CALENDAR YEAR**

TRA Annual Reporting Comparison

Used

Substance	CAS No.	Reporting Units	Reported Value for the Previous Year	Reported Value for the Current Year	% Change	Comment if Change +/- 10%
Chromium	N/A-4	tonnes	31.003	42.895	38%	Increase in fabrication processes in 2018 to manufacture a specific product for a client, resulted in increases to steels used and cut on plasma table and increase in use of reportable substances contained in steel and shot blasting material.
Manganese	N/A-9	tonnes	41.498	57.416	38%	
Nickel	N/A-10	tonnes	38.519	53.294	38%	
PM - Particulate Matter	N/A-M08	tonnes	—	—	—	—
PM10 - Particulate Matter <=10 Micrometers	N/A-M09	tonnes	—	—	—	—
PM2.5 - Particulate Matter <=2.5 Micrometers	N/A-M10	tonnes	—	—	—	—

Created

Substance	CAS No.	Reporting Units	Reported Value for the Previous Year	Reported Value for the Current Year	% Change	Comment if Change +/- 10%
Chromium	N/A-4	tonnes	—	—	—	—
Manganese	N/A-9	tonnes	—	—	—	—
Nickel	N/A-10	tonnes	—	—	—	—
PM - Particulate Matter	N/A-M08	tonnes	52.487	35.290	-33%	Improved data on vehicle movements and numbers on unpaved roads was collected in 2018 and resulted in refined, more accurate release estimates.
PM10 - Particulate Matter <=10 Micrometers	N/A-M09	tonnes	15.299	10.475	-32%	
PM2.5 - Particulate Matter <=2.5 Micrometers	N/A-M10	tonnes	1.892	1.412	-25%	

Contained in Product

Substance	CAS No.	Reporting Units	Reported Value for the Previous Year	Reported Value for the Current Year	% Change	Comment if Change +/- 10%
Chromium	N/A-4	tonnes	29.494	40.635	38%	Increase in fabrication processes in 2018 to manufacture a specific product for a client, resulted in increases to steels used and cut on plasma table and increase in use of reportable substances contained in steel.
Manganese	N/A-9	tonnes	12.808	3.504	-73%	Increase in operation of shot blasting dust collectors in 2018 resulted in increase in amount of metallic dusts collected and recycled which contains manganese. Therefore less manganese was estimated to be contained in products, as calculation is based on total inputs of manganese less amounts recycled and released to air.
Nickel	N/A-10	tonnes	36.644	50.508	38%	Increase in fabrication processes in 2018 to manufacture a specific product for a client, resulted in increases to steels used and cut on plasma table and increase in use of reportable substances contained in steel.
PM - Particulate Matter	N/A-M08	tonnes	—	—	—	—
PM10 - Particulate Matter <=10 Micrometers	N/A-M09	tonnes	—	—	—	—
PM2.5 - Particulate Matter <=2.5 Micrometers	N/A-M10	tonnes	—	—	—	—

APPENDIX C: TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES

TOXIC SUBSTANCE REDUCTION PLAN OBJECTIVES

The following are plan objectives taken from respective Toxic Substance Reduction Plans. This information is included in this Report on Plans in order to satisfy s.26(2)3 of O.Reg. 455/09.

Chromium, Manganese, Nickel

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.

Particulate Matter, PM10, PM2.5

The Objectives of the Plan are as follows:

- provide the reader with information on measures currently in place at the Facility which control the "creation" and subsequent release of the Toxic Substance;
- provide support for the Facility's position with respect to the Statement of Intent of this Plan; and
- document how the Facility has fulfilled the applicable requirements under the TRA and O.Reg.455/09 with respect to the Toxic Substance.

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.