

## REPORT ON TOXIC SUBSTANCE REDUCTION PLANS (2019 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
<b>Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any</b>	This Report on Toxic Substance Reduction Plans applies to the Toxic Substance Reduction Plans for the following prescribed Toxic Substances: <b>Chromium, Manganese, Nickel</b> (Per O.Reg.455/09; “no single CAS numbers apply to these substances”) and <b>Particulate Matter, PM10, PM2.5</b> (Per O.Reg.455/09; “no single CAS numbers apply to these substances”)
<b>National Pollutant Release Inventory (NPRI) and O.Reg.127/01 Identification Numbers</b>	NPRI ID: 29772 O.Reg.127/01 ID: N/A
<b>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</b>	DECAST Ltd. 8807 County Road 56 Utopia, Ontario L0M1T0 Canada
<b>The number of full time employee equivalents at the facility</b>	450
<b>North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code</b>	32 – Manufacturing 3273 – Cement and concrete product manufacturing 327330 – Concrete pipe, brick and block manufacturing
<b>Public contact</b>	Bruce Parrinder Manager, Environmental Health and Safety/Human Resources DECAST Ltd. [address per above] (705) 734-2892
<b>The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum</b>	UTM Zone 17 594127 E, 4910051 N
<b>Parent Company Information</b>	Decast Holdings 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 May 21, 2020, 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\*

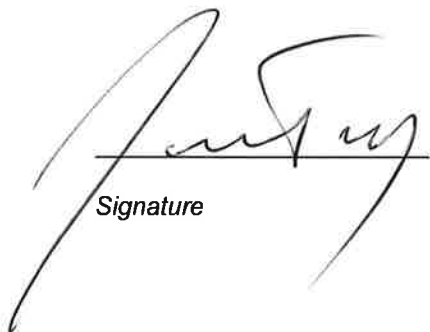
PM-10\*

PM-2.5\*

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

JIM TULLY, EXECUTIVE VICE PRESIDENT

Name and Position

  
Signature

May 21, 2020  
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	—	>10 to 100
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	42.895	55.055	28%	Increase in use of plasma cutter during 2019 to cut more mild and stainless steel, therefore usage of steels increased resulting in increase to the toxic substances used. Usage of steel shot/grit, containing manganese, also increased.
Manganese	N/A-9	tonnes	57.416	73.407	28%	
Nickel	N/A-10	tonnes	53.294	68.402	28%	
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	35.290	41.524	18%	Increases due to increased vehicle traffic on unpaved roads (road dust), and increased dry plasma cutting operations. Also fewer days in 2019 with either snow on ground or precipitation, resulting in more dust release days and increased annual release.
PM10 - Particulate Matter <=10 Micrometers	N/A-M09	tonnes	10.475	12.142	16%	
PM2.5 - Particulate Matter <=2.5 Micrometers	N/A-M10	tonnes	1.412	1.549	10%	

**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	40.635	51.838	28%	Increase in use of plasma cutter during 2019 to cut more mild and stainless steel, therefore usage of steels increased resulting in increase to the amount of toxic substance contained in final steel products.
Manganese	N/A-9	tonnes	3.504	68.615	>100%	Increase in use of plasma cutter during 2019 included increased use of shot/grit and steel containing the toxic substance. However, the amount of manganese recycled decreased because there was less plasma cutting scrap generated and less recycled metallic dust due to reduced dust collector operations. Plasma scrap decreased compared to the previous year because the previous year's operations included wet plasma cutting operating simultaneously with dry cutting for part of the year. There was also no plasma sludge generated and recycled in 2019, which would contain the toxic substance.  In addition, the Facility started using a new shotgrit product in 2019 with much lower manganese content than previous shotgrit product (99% less manganese in new shotgrit compared to previous). This resulted in a large reduction in the amount of manganese contained in metallic dusts captured by the dust collector and sent to recycling.  Therefore more manganese was estimated to be contained in products, as the calculation is based on total inputs of manganese less amounts recycled (as sludge, dust or scrap) and released to air.
Nickel	N/A-10	tonnes	50.508	64.403	28%	Increase in use of plasma cutter during 2019 to cut more mild and stainless steel, therefore usage of steels increased resulting in increase to the amount of toxic substance contained in final steel products.
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.