1. General Information

Facility Information					
Company Name	Caledon Tubing, a Division of Martinrea International Inc.				
Facility Address	580 James Street South, St. Marys, ON, N4X 1B3				
Site Coordinates (main entrance of site)	17 T 543643.18 mE 4797385.19 m	N			
NPRI ID	10537				
MOE ID	9222				
Number of Full-Time Employees in 2014	71				
2-Digit NAICS Code	33 – Manufacturing				
4- Digit NAICS Code	3312 – Steel Product Manufacturing from Purchased Steel				
6-Digit NAICS Code	331221 – Cold-rolled steel shape manufacturing				
Substance Information					
Substance N	ame	CAS #			
Zinc (and its compounds)		NA – 14			
Propylene glycol methyl ether acetate		108-65-6			
Facility Contact Information					
Report Prepared by	Envirolum Consulting Ms. Connie Lum Principal Consultant Phone #: 519-635-2286	Connielum.ehs@gmail.com Kitchener, ON			
Public Contact	Mr. Mike Hallam General Manager Phone #: 519-349-2850 Fax #: 519-349-2844	Mike.hallam@martinrea.com 580 James Street South St. Marys, ON N4X 1B3			

2. Toxic Substance Accounting Summary

Facility-wide Amounts of Toxic Substances Reported for 2015:

Substance Name	Used	Created	Contained In Product	Release to Air	Disposed / Recycled
Zinc (and its compounds)	10 to 100		10 to 100	0 to 1	10 to 100
Propylene glycol methyl ether acetate	10 to 100			10 to 100	

NOTE: Units are expressed in tonnes, unless otherwise indicated. '-- ' indicates not applicable.

3. Quantification Comparison to Previous Year

3.1 Zinc (and its compounds)

	Unit	2015	2014	Change (Unit)	Change (%)	Rationale for Change
Used	Tonnes	100 to 1,000	100 to 1,000	↑ 10 to 100	↓ 41.2	Update MSDS % concentration (decreased), however usage increased overall total.
Created						
Contained In Product	Tonnes	10 to 100	10 to 100	↓ 10 to 100	↓ 51.7	Mass balance.
Release to Air	Tonnes	0 to 1	0 to 1	0	0	
Release to Water						
On-site Disposal						
Transferred for Disposal						
Transferred for Recycling	Tonnes	100 to 1,000	10 to 100	10 to 100	† 78.2%	Increased amount may be due to material defect, time of disposal, or amount collected.

3.2 Propylene glycol methyl ether acetate (PM Acetate)

	Unit	2015	2014	Change (Unit)	Change (%)	Rationale for Change
Used	Tonnes	10 to 100	10 to 100	↓ 1 to 10	↓ 9.0	No significant change.
Created						
Contained In Product						
Release to Air	Tonnes	10 to 100	10 to 100	↓ 1 to 10	↓ 9.0	
Release to Water						
On-site Disposal						
Transferred for Disposal						
Transferred for Recycling						

4. Objectives

Zinc (and its compounds):

Caledon Tubing prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. There are no options identified which will be implemented, however, as part of the continuous improvement program at the facility new opportunities will be reviewed on an on-going basis. As part of the continuous improvement practices at the facility, technical advances will be monitored for new opportunities to reduce the use of zinc at the facility.

PM Acetate:

Caledon Tubing prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. Wherever feasible, we will aim to reduce the use and emissions of PM Acetate at the facility. Further, this plan will determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time. As part of the continuous improvement practices at the facility, technical advances will be monitored for new opportunities to reduce the use of PM Acetate at the facility.

5. Progress in Implementing Plan

5.1 Summary of Implementation for PM Acetate

Option to Implement	Amount Reduced during the prior calendar year					
	Used	Created	Discharge to Air	Discharge to Water	Discharge to Land	Contained in Product*
Improve application techniques.	0	0	0	0	0	-

* NOTE: this applies only to those prescribed toxic substances that are not Criteria Air Contaminants, Volatile Organic Compounds (Part 4 or Part 5 of NPRI notice), or acetone.

5.2 The timelines set out in the current version of the plan is not on schedule due to no capital budget approval before 2016.

5.3 Comparison of Planned vs. Actual Actions Taken

Options to Implement	Implementation Steps Identified in the Plan	Actual Steps Taken during the prior calendar year
Improved application techniques.	Purchase equipment Install equipment Run trial Start-up	No implementation of reduction options until 2016.

For information on on-site releases from the facility, as well as disposal and off-site recycling information please refer to National Pollutant Release Inventory's website: <u>http://www.ec.gc.ca/inrp-npri/.</u>

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As of <u>May 2</u>, 2016, I, Mike Hallam, certify that I have read the reports on the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the information contained in the reports is factually accurate and the reports comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Zinc (and its compounds) Propylene Glycol Methyl Ether Acetate

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Mike Hallam General Manager Caledon Tubing

05/19/2016