

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 mN	
NPRI ID	10537	
MOE ID	9222	
Number of Full-Time Employees	64	
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 Name	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	Wayne Huettlin Operations Manager Phone #: 519-349-2850 Fax #: 519-349-2844	wayne.huettlin@martinrea.com 580 James Street South St. Marys, ON N4X 1B3

2. Toxic Substance Accounting Summary

Facility-wide Amounts of Toxic Substances Reported for 2019:

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	1 to 10	--	--	1 to 10	--

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	2019	2018	Change (Unit)	Change (%)	Rationale for Change
Used	Tonnes	10 to 100	100 to 1,000	↓ 10 to 100	↓ 27.5	Decreased production.
Created	--	--	--	--	--	
Contained In Product	Tonnes	10 to 100	10 to 100	↓ 10 to 100	↓ 28.6	
Release to Air	Tonnes	0 to 1	0 to 1	↓ 0 to 1	↓ 27.5	
Release to Water	--	--	--	--	--	
On-site Disposal	--	--	--	--	--	
Transferred for Disposal	--	--	--	--	--	
Transferred for Recycling	Tonnes	10 to 100	10 to 100	↓ 10 to 100	↓ 25.6	

3.2 Propylene glycol methyl ether acetate (PM Acetate)

	Unit	2019	2018	Change (Unit)	Change (%)	Rationale for Change
Used	Tonnes	1 to 10	10 to 100	↓ 1 to 10	↓ 28.2	Decreased production.
Created	--	--	--	--	--	
Contained In Product	--	--	--	--	--	
Release to Air	Tonnes	1 to 10	10 to 100	↓ 1 to 10	↓ 28.2	
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 (tonnes)					
	Used	Created	Discharge to Air	Discharge to Water	Discharge to Land	Contained in Product*
Improve application techniques.	1.0	0	1.0	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 has changed to February 2017. Implementation of this option has been completed.

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	None taken. Implementation completed in 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: <http://www.ec.gc.ca/inrp-npri/>.

6. Highest Ranking Certification

The original copy of the signed certification of the annual report is kept on file at the facility.

ON MECP TRA - Electronic Certification Statement

Annual Report Certification Statement

As of 2020-03-12, I, Wayne Huettlin, 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.

TRA Substance List*

CAS RN	Substance Name
108-65-6	Propylene glycol methyl ether acetate
NA - 14	Zinc (and its compounds)

Company Name

Caledon Tubing

Highest Ranking Employee

Wayne Huettlin

Report Submitted by

Wayne Huettlin

Website address

<https://www.envirolum.com/caledon-tubing-a-division-of-martinrea-international.html>

I, the highest ranking employee, agree with the certification statement(s) above and acknowledge that by checking the box I am electronically signing the statement(s). I also acknowledge that by pressing the 'Submit Report(s)' button I am submitting the facility record(s)/report(s) for the identified facility to the Director under the Toxics Reduction Act, 2009. I also acknowledge that the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 provide the authority to the Director under the Act to make certain information as specified in subsection 27(5) of Ontario Regulation 455/09 available to the public.

Submitted Report

Period	Submission Date	Facility Name	Province	City	Programs
2019	2020-03-12	CALEDON TUBING	Ontario	St. Marys	NPRI, ON MECP TRA