Report:

Laurel Steel 2019 Toxic Reduction Plan

Date: June 15, 2020

1. SUMMARY

Laurel Steel is providing this Toxic Reduction Accounting Report to fulfill its annual Toxic Reduction Act (TRA) and Ontario Regulation 455/09 public reporting requirements for the 2019 reporting year. Under these requirements the facility is required to undertake toxic substance accounting to better understand the quantities of toxic substances that are used, created, transformed, destroyed, released, and disposed of.

Facility Description:

Laurel Steel manufactures low carbon free-machined cold finished bar products for the automotive and various other industries as well as fabricated wire mesh for the construction and mining industries.

2. FACILITY INFORMATION

Facility Name: Laurel Steel NPRI Identification Number: 1578 Two Digit NAICS Code: 33 Four Digit NAICS Code: 1221 Six Digit NAICS Code: 331221 Number of Full-time Employees: 165 UTM Spatial Coordinates (NAD83): U

UTM Easting 600623.00 UTM Northing 4804494.00 Datum: 1983, Zone 17

2.1. Owner of the Facility Information

Name: Laurel Steel Address: 5400 Harvester Road, Burlington, Ont. Phone Number: 905 681-6811 Fax Number: 905 634-7888 E-mail: <u>mike.caruso@laurelsteel.com</u>

2.2. Operator of the Facility Information

Name: Laurel Steel Address: 5400 Harvester Road, Burlington, Ont. Phone Number: 905 681-6811 Fax Number: 905 634-7888 E-mail: <u>mike.caruso@laurelsteel.com</u>

2.3. Parent Company Information

Legal Name of Parent Company: Harris Steel, ULC Address of Parent Company: 318 Arvin Ave., Stoney Creek, Ont. % of Facility Owned by Company: 100

2.4. Toxic Substances for Which Facility Must Report:

Substance 1 (covered by this plan): CAS Number: NA-08 Substance 2 (covered by this plan): CAS Number: 7647-01-0

2.5. Plan Contacts

Person Coordinating the Preparation of the Plan Name: Michael Caruso Position: Environmental Coordinator Phone Number: 905 681-6811 Fax Number: 905 634-7888 E-mail: <u>mike.caruso@laurelsteel.com</u>

Facility Details

Review of quantification methods and a rationale if the methodology has changed from previous reports, including a description of how the change affects tracking and quantification of the substance: There have been no changes in the quantification method that would result in increases or decreases in quantities estimated. There is no change recommended in TRA Plan.

A statement of whether there has been a significant process change at the facility during the previous calendar year:

There have been no significant process changes at the facility.

Progress towards toxic substance reductions: N/A

Current TRA Plan Date(s): December 18, 2012 (original) for lead and hydrochloric acid

Substance Information and Certification:

Provided in Sections 3 and 4.

3. STATEMENT OF INTENT AND OBJECTIVES:

Laurel Steel will not pursue any reduction options for the two substances, as they were found to be technically unfeasible or their impact would be irrelevant.

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cas #	Substance	Year	Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling	Substance Contained in Product (MT)
NA-08	Lead	2019	102.0	0	0	.0002	0	.081	0	3.9	98.0
		2018	113.5	0	0	.0001	0	.038	0	4.1	109.4
Change Beth	Change Between 2019 - 2018 (MT)		-11.5			+.0001		+.043		-0.2	-11.4
% Change From 2018	rom 2018		-10.0			+100.0		+113		-4.9	-10.4
Reason for (Reason for Change / Comments:		Production related	NC	NC	Production related	NC	Production related	NC	NC	Production related
			Amour	Amount of Substance (MT)	e (MT)	Release	Releases (MT)	Off-	Off-Site Transfers (MT)	Т)	Amount of
cas #	Substance	Year	Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Disposal	Incineration	Recycling	Substance Contained in Product (MT)
7647-01-0	Hydrochloric Acid	2019	57.9	0	52.4	.132	0	2.4	0	2.4	0
		2018	96.4	0	88.5	.066	0	1.1	0	6.7	0
Change Beth	Change Between 2019 - 2018 (MT)		-38.5		-36.1	+100		+1.3		-4.3	
% Change From 2018	om 2018		-39.9		-40.1	0		+118.2		-64.2	
Reason for (Reason for Change / Comments:		Production related	NC	Production related	Production related	NC	Production related	SC	Production related	NC

NC - No Change in Reported Quantities (Less Than 10% or Small Quantity)

Zinc is no longer a reportable substance since it retains the Article status

4. ACCOUNTING CERTIFICATION

As of July 3, 2019, I Wayne Dewitt , certify that I have read the annual Toxic Reduction Accounting Report for the substances listed and am familiar with its contents, and to my knowledge the report is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Substance 1: Lead Substance 2: Hydrochloric Acid

Wayne Dewitt, Plant Manager

June 15, 2020