

Report:

Baycoat 2018 Toxic Reduction Accounting Report

Date: June 25, 2019

1. SUMMARY

Baycoat 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 2018 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:

The facility is located at 244 Lanark Street in Hamilton, Ontario. The NAICS code for the facility is 332810—Coating, Engraving, Heat Treating and Allied Activities. Baycoat operates two coating lines which apply paint to cold-rolled and zinc coated steel strips in a continuous process.

2. FACILITY INFORMATION

Facility Legal Name:	Dofasco Inc., Stelco Inc.
Operating Name:	Baycoat
NPRI Identification Number:	15
Two Digit NAICS Code:	33
Four Digit NAICS Code:	3328
Six Digit NAICS Code:	332810
Number of Full-time Employees:	170
UTM Spatial Coordinates (NAD83):	Latitude: 43.24280 Longitude: -79.75030

2.1. Owner of the Facility Information

See sections 2.2 and 2.3

2.2. Operator of the Facility Information

Name:	Graham Brown
Address:	244 Lanark St., Hamilton, ON, L8N 3K7
Phone Number:	905-561-0965
Fax Number:	905-560-1674
E-mail:	gbrown@baycoat.com

2.3. Parent Company Information

Legal Name of Parent Company:	Stelco Incorporated
Address of Parent Company:	386 Wilcox Street
% of Facility Owned by Company:	100 %
CCRA Business Number:	105011837

2.4. Toxic Substances for Which Facility Must Report:

Substance 1 (covered by TR Plan - Chromium): Chromium (Surface Treatment Metal)
CAS Number: NA-04

Substance 2(covered by TR Plan – Nickel, & Zinc): Nickel (Metal of Steel Coil)
CAS Number: NA-11

Substance 3(covered by TR Plan – Nickel, & Zinc): Zinc (Metal of Steel Coil)
CAS Number: NA-14

Substance 4(covered by TR Plan – Phase 1 Surface Coating Organics): Xylene (Surface Coating Organic)
CAS Number: 1330-20-7

Substance 5(covered by TR Plan – Phase 1 Surface Coating Organics): Toluene (Surface Coating Organic)
CAS Number: 108-88-3

Substance 6(covered by TR Plan – Phase 1 Surface Coating Organics): Ethylbenzene (Surface Coating Organic) CAS Number: 100-41-4

Substance 7(covered by TR Plan – Phase 1 Surface Coating Organics): Naphthalene (Surface Coating Organic) CAS Number: 91-20-3

Substance 8(covered by TR Plan – Phase 1 Surface Coating Organics): Methanol (Surface Coating Organic) CAS Number: 67-56-1

Substance 9 (covered by TR Plan – Phase 2 Surface Coating Organics (3 VOCs)): Methyl Isobutyl Ketone (Surface Coating Organic) CAS Number: 108-10-1

Substance 10 (covered by TR Plan – Phase 2 Surface Coating Organics (3 VOCs)): Methyl Ethyl Ketone (Surface Coating Organic) CAS Number: 78-93-3

Substance 11 (covered by TR Plan – Phase 2 Surface Coating Organics (3 VOCs)): Isopropyl Alcohol (Surface Coating Organic) CAS Number: 67-63-0

Substance 12 (covered by TR Plan – Phase 2 Nitrogen Oxides): Nitrogen Oxide (as NO₂) (Product of Combustion) CAS Number: 11104-93-1

Substance 13 (covered by TR Plan – Phase 2 Surface Coating Organics (5 VOCs)): 1,2,4Trimethyl Benzene (Surface Coating Organic) CAS Number: 95-63-6

Substance 14 (covered by TR Plan – Phase 2 Surface Coating Organics (5 VOCs)): 2-butoxyethanol (Surface Coating Organic) CAS Number: 111-76-2

Substance 15 (covered by TR Plan – Phase 2 Surface Coating Organics (5 VOCs)): Solvent Naphtha Light (Surface Coating Organic) CAS Number: 64742-95-6

Substance 16 (covered by TR Plan – Phase 2 Surface Coating Organics (5 VOCs)): Butyl Carbitol Solvent (Surface Coating Organic) CAS Number: 112-34-5

Substance 17 (covered by TR Plan – Phase 2 Surface Coating Organics (5 VOCs)): Medium Aromatic Naphtha (Surface Coating Organic) CAS Number: 64742-94-5

2.5. Plan Contacts

Person Coordinating the Preparation of the Plan Name: Scott Manser

License Number: TSRP0071

Position: Senior Project Manager

Address: 1421 Grand Maris Rd W. Windsor, ON N9E 4V0

Phone Number: 519-966-8798

Fax Number: 519-966-8014

E-mail: smanser@ortech.com

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:

The quantification method used for all substances is a mass balance using inventory transfer, hazardous and non-hazardous waste records and the National Pollutant Release Inventory (NPRI).

Use + Creation = Transformed + Destroyed + Contained in Product + Released to Air + Released to Land + Released to Water + On-site or Off-site Disposal + Off-site Transfers (for Recycling)

The facility looked into other available quantification methods for the chemical processes before selecting the current method. The current method was selected based on the fact that it is:

- Accurate, because of the net weight of the metals and how they are tracked
- Hazardous and non hazardous waste and analytical data information
- Cost effective because no additional measurement are required
- Spill free- as the process maintains a spill prevention program

No change in quantification methods and rationale occurred in how quantities were estimated from the 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 during the calendar year.

Progress towards toxic substance reductions:

There were no new opportunities identified in 2018 that addressed the current technological challenges for reducing toxic substances at Baycoat. A customer driven trial of Chrome-free paint was conducted in 2016, but further research is needed.

Current TRA Plan Date(s):

December 21, 2012

TR Plan – Chromium, TR Plan Nickel & Zinc

TR Plan – Phase 1 Surface Coating Organics: Xylene, Toluene Ethylbenzene, Naphthalene and Methanol

December 31, 2013

TR Plan – Phase 2 Surface Coating Organics (3 VOCs): Methyl Isobutyl Ketone, Methyl Ethyl Ketone, Isobutyl Alcohol

TR Plan - Nitrogen Oxides

June 16, 2016

TR Plan – Phase 2 Surface Coating Organics (5 VOCs): 1,2,4 – trimethyl benzene, 2-butoxyethanol, Solvent Naphtha Light, Butyl Carbitol Solvent, Medium Aromatic Naphtha

Substance Information and Certification:

Provided in Sections 3 and 4.

3. STATEMENT OF INTENT AND OBJECTIVES:

Baycoat will strive to reduce the use of the twenty (20) toxic substances listed in this report at the facility. Baycoat intends to reduce the use/transfer of these substances at the facility, if feasible to do so. The facility does not create these substances; therefore, this plan will not address reducing their creation.

COMPARISON OF TOXIC SUBSTANCE ACCOUNTING

Toxic Substance Act - Reporting Year 2018

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
100-41-4	Ethylbenzene	2018	10-100	0.00	40.84	1.26	0.00	0.00	0.00	0.00	0-10	
		2017	10-100	0.00	37.43	1.16	0.00	0.00	0.00	0.00	0-10	
		Change Between 2018 - 2017 (MT)		3.51	0.00	3.41	0.11	0.00	0.00	0.00	0.00	0.00
		% Change From 2017		9%	0%	9%	9%	0%	0%	0%	0%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	NC	NC

Notes: NC - No change or less than 10% change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
108-10-1	Methyl isobutyl ketone	2018	10-100	0.00	12.21	0.38	0.00	0.00	0.00	7.21	0-10	
		2017	10-100	0.00	11.18	0.34	0.00	0.00	0.00	8.34	0-10	
		Change Between 2018 - 2017 (MT)		-0.06	0.00	1.03	0.03	0.00	0.00	0.00	-1.13	0.00
		% Change From 2017		0%	0%	9%	9%	0%	0%	0%	-14%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	C	NC

Notes: NC - No change or less than 10% change
C - Within normal variation of process / operation

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
108-65-6	Propylene glycol methyl ether acetate	2018	100-1,000	0.00	101.80	3.15	0.00	0.00	0.00	0.00	0-10	
		2017	10-100	0.00	95.75	2.96	0.00	0.00	0.00	0.0	0-10	
		Change Between 2018 - 2017 (MT)		6.24	NA	NA	NA	NA	NA	NA	NA	0.00
		% Change From 2017		6%	0%	6%	6%	0%	0%	0%	0%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	NC	NC

Notes: NC - No change or less than 10% change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
108-88-3	Toluene	2018	100-1,000	0.00	21.95	0.66	0.00	0.00	0.00	142.76	0-10	
		2017	100-1,000	0.00	23.45	0.71	0.00	0.00	0.00	138.84	0-10	
		Change Between 2018 - 2017 (MT)		2.43	0.00	-1.50	-0.04	0.00	0.00	0.00	3.92	0.00
		% Change From 2017		1%	0%	-6%	-6%	0%	0%	0%	3%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	NC	NC

Notes: NC - No change or less than 10% change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
11104-93-1	Nitrogen oxides (expressed as nitrogen dioxide)	2018	0-10	23.02	0.00	23.02	0.00	0.00	0.00	0.00	0-10	
		2017	0-10	22.00	0.00	22.00	0.00	0.00	0.00	0.00	0-10	
		Change Between 2018 - 2017 (MT)		0.00	1.02	0.00	1.02	0.00	0.00	0.00	0.00	0.00
		% Change From 2017		0%	5%	0%	5%	0%	0%	0%	0%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	NC	NC

Notes: NC - No change or less than 10% change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
111-76-2	2-Butoxyethanol	2018	100-1,000	0.00	299.67	9.27	0.00	0.00	0.00	0.00	0-10	
		2017	100-1,000	0.00	276.02	8.54	0.00	0.00	0.00	0.00	0-10	
		Change Between 2018 - 2017 (MT)		24.39	0.00	23.65	0.73	0.00	0.00	0.00	0.00	0.00
		% Change From 2017		9%	0%	9%	9%	0%	0%	0%	0%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	NC	NC

Notes: NC - No change or less than 10% change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
112-34-5	Diethylene glycol butyl ether	2018	10-100	0.00	67.61	2.09	0.00	0.00	0.00	0.00	0-10	
		2017	10-100	0.00	67.99	2.10	0.00	0.00	0.00	0.00	0-10	
		Change Between 2018 - 2017 (MT)		-0.38	0.00	-0.37	-0.01	0.00	0.00	0.00	0.00	0.00
		% Change From 2017		-1%	0%	-1%	-1%	0%	0%	0%	0%	0%
Reason for Change / Comments:			NC	NC	NC	NC	NC	NC	NC	NC	NC	

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cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
1330-20-7	Xylene (all isomers)	2018	100-1,000	0.00	202.11	6.25	0.00	0.00	0.00	42.95	0-10	
		2017	100-1,000	0.00	183.69	5.67	0.00	0.00	0.00	52.96	0-10	
		Change Between 2018 - 2017 (MT)		9.05	0.00	18.42	0.57	0.00	0.00	0.00	-10.01	0.00
		% Change From 2017		4%	0%	10%	10%	0%	0%	0%	-19%	0%
Reason for Change / Comments:			NC	NC	NC	NC	NC	NC	NC	C	NC	

Notes: NC - No change or less than 10% change
C - Normal variation due to process and operations.

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
64742-94-5	Heavy aromatic solvent naphtha	2018	100-1,000	0.00	313.41	9.69	0.00	0.00	0.00	12.49	0-10	
		2017	100-1,000	0.00	317.93	9.83	0.00	0.00	0.00	8.25	0-10	
		Change Between 2018 - 2017 (MT)		-0.44	0.00	-4.52	-0.14	0.00	0.00	0.00	4.23	0.00
		% Change From 2017		0%	0%	-1%	-1%	0%	0%	0%	51%	0%
Reason for Change / Comments:			NC	NC	NC	NC	NC	NC	NC	C	NC	

Notes: NC - No change or less than 10% change
C - Normal variation due to process and operations.

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
64742-95-6	Light aromatic solvent naphtha	2018	100-1,000	0.00	342.89	10.60	0.00	0.00	0.00	31.68	0-10	
		2017	100-1,000	0.00	251.48	7.77	0.00	0.00	0.00	36.08	0-10	
		Change Between 2018 - 2017 (MT)		89.88	0.00	91.41	2.83	0.00	0.00	0.00	-4.40	0.00
		% Change From 2017		30%	0%	36%	36%	0%	0%	0%	-12%	0%
		Reason for Change / Comments:		B	NC	B	B	NC	NC	NC	C	NC

Notes:
NC - No change or less than 10% change
B - Change in usage and/or production volume
C - Normal variation due to process and operations.

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
67-56-1	Methanol	2018	10-100	0.10	4.24	0.23	0.00	0.00	0.00	19.79	0-10	
		2017	10-100	0.10	4.30	0.23	0.00	0.00	0.00	20.16	0-10	
		Change Between 2018 - 2017 (MT)		-0.43	0.00	-0.07	0.00	0.00	0.00	0.00	-0.37	0.00
		% Change From 2017		-2%	2%	-2%	0%	0%	0%	0%	-2%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	NC	NC

Notes: NC - No change or less than 10% change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
67-63-0	Isopropyl alcohol	2018	0-10	0.00	2.98	0.09	0.00	0.00	0.00	0.00	0-10	
		2017	0-10	0.00	2.86	0.09	0.00	0.00	0.00	0.00	0-10	
		Change Between 2018 - 2017 (MT)		0.13	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00
		% Change From 2017		4%	0%	4%	4%	0%	0%	0%	0%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	NC	NC

Notes: NC - No change or less than 10% change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
71-36-3	n-Butyl alcohol	2018	100-1,000	0.00	114.54	3.54	0.00	0.00	0.00	0.00	0-10	
		2017	100-1,000	0.00	111.90	3.46	0.00	0.00	0.00	0.0	0-10	
		Change Between 2018 - 2017 (MT)		2.72	0.00	2.64	0.08	0.00	0.00	0.00	0.00	0.00
		% Change From 2017		2%	0%	2%	2%	0%	0%	0%	0%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	NC	NC

Notes: NC - No change or less than 10% change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
78-93-3	Methyl ethyl ketone	2018	100-1,000	0.00	200.46	6.19	0.00	0.00	0.00	36.06	0-10	
		2017	100-1,000	0.00	174.85	5.40	0.00	0.00	0.00	31.33	0-10	
		Change Between 2018 - 2017 (MT)		31.13	0.00	25.61	0.79	0.00	0.00	0.00	4.74	0.00
		% Change From 2017		15%	0%	15%	15%	0%	0%	0%	15%	0%
		Reason for Change / Comments:		B	NC	B	B	NC	NC	NC	C	NC

Notes: NC - No change or less than 10% change
B - Change in usage and/or production volume
C - Normal variation due to process and operations.

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
91-20-3	Naphthalene	2018	10-100	0.00	30.37	0.94	0.00	0.00	0.00	0.00	0-10	
		2017	10-100	0.00	28.65	0.89	0.00	0.00	0.00	0.00	0-10	
		Change Between 2018 - 2017 (MT)		1.77	0.00	1.72	0.05	0.00	0.00	0.00	0.00	0.00
		% Change From 2017		6%	0%	6%	6%	0%	0%	0%	0%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	NC	NC

Notes: NC - No change or less than 10% change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
95-63-6	1,2,4-Trimethylbenzene	2018	100-1,000	0.00	227.62	7.04	0.00	0.00	0.00	0.00	0-10	
		2017	100-1,000	0.00	223.18	6.90	0.00	0.00	0.00	0.00	0-10	
		Change Between 2018 - 2017 (MT)		4.58	0.00	4.44	0.14	0.00	0.00	0.00	0.00	0.00
		% Change From 2017		2%	0%	2%	2%	0%	0%	0%	0%	0%
Reason for Change / Comments:			NC	NC	NC	NC	NC	NC	NC	NC	NC	

Notes: NC - No change or less than 10% change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
NA - 04	Chromium (and its compounds)	2018	10-100	0.00	0.00	0.00	0.021	4.48	0.00	0.00	0-10	
		2017	0-10	0.00	0.00	0.00	0.020	5.92	0.00	0.00	0-10	
		Change Between 2018 - 2017 (MT)		1.11	0.00	0.00	0.00	0.001	-1.44	0.00	0.00	2.55
		% Change From 2017		11%	0%	0%	0%	3%	-24%	0%	0%	64%
Reason for Change / Comments:			B	NC	NC	NC	NC	C	NC	NC	C	

Notes: NC - No change or less than 10% change
 B - Change in usage and/or production volume
 C - Normal variation due to process and operations.
 C - small quantity, minor change

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
NA - 11	Nickel (and its compounds)	2018	10-100	0.00	0.00	0.00	0.007	3.51	0.00	0.00	0-10	
		2017	10-100	0.00	0.00	0.00	0.006	4.64	0.00	0.00	0-10	
		Change Between 2018 - 2017 (MT)		0.58	0.00	0.00	0.00	0.000	-1.13	0.00	0.00	1.71
		% Change From 2017		5%	0%	0%	0%	3%	-24%	0%	0%	21%
Reason for Change / Comments:			NC	NC	NC	NC	NC	C	NC	NC	C	

Notes: NC - No change or less than 10% change
 C - Normal variation due to process and operations.

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
NA - 14	Zinc (and its compounds)	2018	10,000-100,000	0.00	0.00	0.00	0.005	31.51	0.00	0.00	10,000-100,000	
		2017	10,000-100,000	0.00	0.00	0.00	0.005	41.63	0.00	0.00	10,000-100,000	
		Change Between 2018 - 2017 (MT)		0.08	0.00	0.00	0.00	0.000	-10.13	0.00	0.00	10.21
		% Change From 2017		0%	0%	0%	0%	3%	-24%	0%	0%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	C	NC	NC	NC

Notes: NC - No change or less than 10% change
C - Normal variation due to process and operations.

cas #	Substance	Reporting Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (MT)	
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling		
67-64-1	Acetone	2018	10-100	0.00	9.78	0.29	0.00	0.00	0.00	67.81	0-10	
		2017	10-100	0.00	10.35	0.31	0.00	0.00	0.00	65.1	0-10	
		Change Between 2018 - 2017 (MT)		2.16	0.00	-0.92	0.08	0.00	0.00	0.00	65.07	0.00
		% Change From 2017		3%	0%	-8%	35%	0%	0%	0%	-100%	0%
		Reason for Change / Comments:		NC	NC	NC	NC	NC	NC	NC	NC	NC

Notes: NC - No change or less than 10% change

4. ACCOUNTING CERTIFICATION

As of _____, 2019, I, Graham Brown, 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.

1. 100-41-4 Ethylbenzene
2. 108-10-1 Methyl isobutyl ketone
3. 108-65-6 Propylene glycol methyl ether acetate
4. 108-88-3 Toluene
5. 11104-93-1 Nitrogen oxides (expressed as nitrogen dioxide)
6. 111-76-2 2-Butoxyethanol
7. 112-34-5 Diethylene glycol butyl ether
8. 1330-20-7 Xylene (all isomers)
9. 64742-94-5 Heavy aromatic solvent naphtha
10. 64742-95-6 Light aromatic solvent naphtha
11. 67-56-1 Methanol
12. 67-63-0 Isopropyl alcohol (1)
13. 71-36-3 n-Butyl alcohol
14. 78-93-3 Methyl ethyl ketone
15. 91-20-3 Naphthalene
16. 95-63-6 1,2,4-Trimethylbenzene
17. NA - 04 Chromium (and its compounds)
18. NA - 11 Nickel (and its compounds)
19. NA - 14 Zinc (and its compounds)
20. 67-64-1 Acetone

_____; _____, 2019
Graham Brown, President and General Manager

ATTACHMENT 1

**Public Report Checklist
(1 page)**

2018 Toxic Substance Act: Public Report Checklist

Details	
Substance name and CAS number	<input checked="" type="checkbox"/>
NPRI and O.Reg.127/01 MOE ID numbers	<input checked="" type="checkbox"/>
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)	<input checked="" type="checkbox"/>
The number of full-time employee equivalents at the facility.	<input checked="" type="checkbox"/>
North American Industry Classification System (NAICS) codes for the facility	<input checked="" type="checkbox"/>
The name, position, telephone number for street address and mailing address for:	<input checked="" type="checkbox"/>
Public contact	<input checked="" type="checkbox"/>
For parent companies:	<input checked="" type="checkbox"/>
Legal name	<input checked="" type="checkbox"/>
Street and mailing address of the company	<input checked="" type="checkbox"/>
The company's percentage of ownership	<input checked="" type="checkbox"/>
The name of all other toxic substances used or created at the facility for which plans are required to be prepared.	<input checked="" type="checkbox"/>
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 (summary only for public)	<input checked="" type="checkbox"/>
A statement of whether there has been a significant process change at the facility during the previous calendar year.	<input checked="" type="checkbox"/>
The amount of the substance used (ranges for public report)	<input checked="" type="checkbox"/>
The amount of the substance that is created. (ranges for public report)	<input checked="" type="checkbox"/>
The quantity released to air	<input checked="" type="checkbox"/>
The quantity released to surface waters	<input checked="" type="checkbox"/>
The quantity released to land	<input checked="" type="checkbox"/>
The quantity disposed of on-site to land	<input checked="" type="checkbox"/>
The quantity transferred off-site for disposal	<input checked="" type="checkbox"/>
The quantity transferred off-site for treatment prior to final disposal	<input checked="" type="checkbox"/>
The quantity transferred off-site for recycling	<input checked="" type="checkbox"/>
Amount contained in product (not required for CACs and VOCs) (ranges for public report)	<input checked="" type="checkbox"/>
Certification of Highest Ranking Employee (copy for public report)	<input checked="" type="checkbox"/>