

Welded Tube of Canada
111 Rayette Road
Concord, ON, L4K 2E9
Phone: (905) 669-1111
Fax: (905) 738-4070
Email: AIozzo@weldedtube.com

May 29, 2015
Job/ref. number: J15015

To Antonietta Iozzo,

RE: 50 Bowes - Compliance and Reporting with the federal National Pollutant Release Inventory (NPRI), Ontario Toxics Reduction Act (TRA) and the Ontario Ministry of the Environment (O. Reg. 127/01) reporting schemes.

NATIONAL POLLUTANT RELEASE INVENTORY (NPRI)

Airzone has completed the evaluation of your NPRI reporting. Based upon the information Welded Tube has provided, calculations indicate that in the calendar year 2014, the Welded Tube facility exceeded the 2014 NPRI Part 4 substance reporting threshold for Volatile Organic Compounds (VOCs) (CAS#: NA-M16), and Part 5 substance reporting threshold for Methyl Ethyl Ketone (CAS#: 78-93-3) and Heavy Alkylate Naphtha (CAS#: 64741-65-7). Thus, the facility is required to report to Environment Canada under NPRI for Volatile Organic Compounds (VOCs), Methyl Ethyl Ketone and Heavy Alkylate Naphtha. The facility did not exceed the reporting threshold for any substances in the 2014 NPRI Part 1a, 1b, 2, or 3.

The total annual emissions for VOCs in 2014 were estimated to be 12.2 tonnes. The NPRI reporting threshold was 10 tonnes.

The total annual emissions for Methyl Ethyl Ketone in 2014 were estimated to be 1.34 tonnes. The NPRI reporting threshold was 1 tonne.

The total annual emissions for Heavy Alkylate Naphtha in 2014 were estimated to be 8.66 tonnes. The NPRI reporting threshold was 1 tonne.

Air emissions for VOCs, Methyl Ethyl Ketone and Heavy Alkylate Naphtha were determined assuming complete volatilization of all products used containing these substances.

ONTARIO MINISTRY OF THE ENVIRONMENT (TRACKING, QUANTIFICATION & REPORTING)

Ontario's Toxics Reduction Act, 2009 and its regulation, O. Reg. 455/09, require facilities in the manufacturing sectors which are also required to provide information under the National Pollutant Release Inventory or O. Reg. 127/01 (for acetone) to account (track and quantify), report and plan for the reduction of prescribed toxic substances.

Based upon the information that Welded Tube has provided, our calculations indicate that the facility, in calendar year 2014, manufactured, processed or otherwise used (MPO) contaminants listed in the O. Reg. 455/09, in sufficient quantities to be reportable. This includes Methyl Ethyl Ketone and Heavy Alkylate Naphtha.

The total annual usage for Methyl Ethyl Ketone for the facility in the 2014 reporting year was 1.34 tonnes. The amount emitted to air Methyl Ethyl Ketone was the same amount as reported to the NPRI program.

The total annual usage for Heavy Alkylate Naphtha for the facility in the 2014 reporting year was 8.66 tonnes. The amount emitted to air Heavy Alkylate Naphtha was the same amount as reported to the NPRI program.

In 2014, Welded Tube did not manufacture, process or otherwise use acetone, and thus, is not required to report to the MOE concerning O. Reg. 127/01.

According to the above reported data, TRA Toxic Substance Reduction Plans will need to be prepared for Methyl Ethyl Ketone and Heavy Alkylate Naphtha. These plans are due December 31, 2015.

The methods used for calculation are consistent with industry standards. All calculations and results have been reviewed by an in-house Senior Air Quality Scientist to ensure data quality.

We are including with this letter an overview of the usages, the MSDS breakdown and summary as well as notes about our assumptions and calculations, for your records. The Usage/Inventory numbers were supplied to us by you via email or verbal communication. The MSDSs used in this work were supplied by the facility and should be kept on site as part of the records.

NPRI/TRA and O. Reg. 127/01 reporting requirements should be reviewed on an annual basis as these requirements may change from year-to-year.

If you have any questions about this work, do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lucas Neil', is written over a light blue horizontal line.

Lucas Neil, Ph.D.
Air Quality Scientist
lneil@airzoneone.com

Summary of numbers reported to SWIMS:

(tonnes)	Volatile Organic Compounds (VOCs)	Methyl Ethyl Ketone	Heavy Alkylate Naphtha
MPO	12.2	1.34	8.66
Used	12.2	1.34	8.66
Created	-	-	-
Air	12.2	1.34	8.66
Disposed	-	-	-
Recycled	-	-	-
Sewage	-	-	-
Spills	-	-	-
Landfill	-	-	-
On part	-	-	-

Summary of Contaminants at Welded Tube and Comparison to Threshold Levels:

<u>Group</u>	<u>Contaminant</u>	<u>CAS No.</u>	<u>Consumption (kg/yr)</u>	<u>MPO Threshold (kg/yr)</u>
Reg 127: Table 2B	Acetone	67-64-1	398	3000
NPRI: Part 1a	Aluminum (fume or dust)	7429-90-5	43	10000
NPRI: Part 1a	Aluminum oxide (fibrous form)	1344-28-1	3	10000
NPRI: Part 1a	Ammonia (total)	NA - 16	1	10000
NPRI: Part 1a	n-Butyl alcohol	71-36-3	27	10000
NPRI: Part 1a	Calcium fluoride	7789-75-5	108	10000
NPRI: Part 1a	Copper (and its compounds)	NA - 06	1	10000
NPRI: Part 1a	Cyanides (ionic)	NA - 07	5	10000
NPRI: Part 1a	Ethylbenzene	100-41-4	24	10000
NPRI: Part 1a	Isopropyl alcohol	67-63-0	294	10000
NPRI: Part 1a	Manganese (and its compounds)	NA - 09	115	10000
NPRI: Part 1a	Methyl ethyl ketone	78-93-3	1,338	10000
NPRI: Part 1a	N-Methyl-2-pyrrolidone	872-50-4	21	10000
NPRI: Part 1a	Xylene (all isomers)	1330-20-7	60	10000
NPRI: Part 4	Carbon monoxide	630-08-0	673	20000
NPRI: Part 4	Nitrogen oxides (expressed as NO ₂)	11104-93-1	801	20000
NPRI: Part 4	PM _{2.5} - Particulate Matter <= 2.5 Microns	NA - M10	30	300
NPRI: Part 4	PM ₁₀ - Particulate Matter <= 10 Microns	NA - M09	218	500
NPRI: Part 4	Sulphur dioxide	7446-09-5	5	20000
NPRI: Part 4	PM - Total Particulate Matter <= 100 Microns	NA - M08	2,757	20000
NPRI: Part 4	Volatile Organic Compounds (VOCs)	NA - M16	12,152	10000
NPRI: Part 5	Acetylene	74-86-2	52	1000
NPRI: Part 5	n-Butyl acetate	123-86-4	63	1000
NPRI: Part 5	Ethyl acetate	141-78-6	10	1000
NPRI: Part 5	Ethyl alcohol	64-17-5	126	1000
NPRI: Part 5	Isopropyl alcohol	67-63-0	294	1000
NPRI: Part 5	Methyl ethyl ketone	78-93-3	1,338	1000
NPRI: Part 5	Propane	74-98-6	171	1000
NPRI: Part 5	Xylene (all isomers)	1330-20-7	60	1000
NPRI: Part 5	Heavy alkylate naphtha	64741-65-7	8,658	1000
NPRI: Part 5	Heavy aromatic solvent naphtha	64742-94-5	0	1000
NPRI: Part 5	Hydrotreated light distillate	64742-47-8	41	1000
NPRI: Part 5	Light aromatic solvent naphtha	64742-95-6	135	1000
NPRI: Part 5	Propylene glycol methyl ether acetate	108-65-6	24	1000
NPRI: Part 5	Solvent naphtha light aliphatic	64742-89-8	46	1000
NPRI: Part 5	Solvent naphtha medium aliphatic	64742-88-7	270	1000

* Note that Part 5 substance reporting is only triggered if the Part 4 VOC limit is exceeded.

Usage summary:

<u>Material</u>	<u>Supplier/Manufacturer</u>	<u>Quantity (kg)</u>
Acetylene, dissolved	Praxair	52.63
Brake Cleaner	Wurth	153.65
Engine Kleen	Kleen-Flo Tumbler	1.71
E-Z Break Anti-Seize Paste, Copper Grade	LA-CO Industries	7.70
Unival Flexi-Film Lubricant	ShraderCanada	10.54
1000-I Fluorescent Marking Ink	Carco, Inc.	251.40
TPKE-WS 140 White MEK pigmented ink	REA Elektronik inc.	770.47
Remover and Cleaner	ITW Dykem	322.94
New rapid tap chlorinated paraffin	Relton Corporation	3.71
TPKE-GB 010	REA Elektronik inc.	715.38
WD-40	WD-40 Company	30.00
Welding Electrode-AWS E7018	Welding Depot	45.00
Weld wire 0.045 115 S-6 (Linde S-6, ER70S-6)	Linde	298.01
Crown 7043 Wire Rope, Chain and Cable Lube	Crown	8.84
Metal-Cor 6 (E70C)	Hobart Brothers	2,150.03
Holland Yellow Rust Paint	Aquarius	1,348.97
Magnaglide D 68	Castrol	21.14
Molub-Alloy 860/150-0 ES	Castrol	544.31
AWS E7018 Welding Electrode	Welding Depot	5.00
OSHA ZINGER PINK	K-G PACKAGING INC.	102.68
Opaque Stains-All Colors	Dykem	180.54
E-SERIES (MIR) ENAMEL SPRAY PAINT (VARIOUS COLOURS)	K-G PACKAGING INC.	698.02
Tribol 4020/220-2	Castrol	2,475.00
PV008-C	Toronto Lube Service	397.69
CL-TKE Cleaner	REA Elektronik , Inc.	241.50
Peerless OG1 450g	Petro-Canada	103.95
Peerless OG1 17kg	Petro-Canada	595.00
Anticorit CPD 5400	Fuchs	10,822.00

MSDS summary:

Manufacturer	Material	Ingredient	CAS No.	Concentration (weight percent)	Min	Max
Praxair	Acetylene, dissolved	Acetylene	74-86-2	99.00%		99.0%
Wurth	Brake Cleaner	Heptane Isomers	64742-49-0	57.50%	55.0%	60.0%
		Isopropyl alcohol	67-63-0	11.25%	10.0%	12.5%
Kleen-Flo Tumbler	Engine Kleen	Hydrotreated light distillate	64742-47-8	80.00%	60.0%	100.0%
		Heavy aromatic solvent naphtha	64742-94-5	3.00%	1.0%	5.0%
		Propane	74-98-6	10.00%	7.0%	13.0%
LA-CO Industries	E-Z Break Anti-Seize Paste, Copper Grade	Copper	7440-50-8	10.00%	10.0%	
		Aluminum (fume or dust)	7429-90-5	2.00%	2.0%	
ShraderCanada	Unival Flexi-Film Lubricant	Hydrocarbon Propellant	68476-86-8	20.00%	10.0%	30.0%
Carco, Inc.	1000-I Fluorescent Marking Ink	Isopropyl alcohol	67-63-0	85.00%	80.0%	90.0%
REA Elektronik inc.	TPKE-WS 140 White MEK pigmented ink	Methyl ethyl ketone	78-93-3	65.00%	50.0%	80.0%
		Diacetone Alcohol	123-42-2	3.00%	2.0%	4.0%
		Propyl Acetate	109-60-4	3.00%	2.0%	4.0%
ITW Dykem	Remover and Cleaner	Acetone	67-64-1	55.00%	50.0%	60.0%
		Ethyl alcohol	64-17-5	25.00%	20.0%	30.0%
		Isobutane	75-28-5	15.00%	10.0%	20.0%
		Propane	74-98-6	3.00%	1.0%	5.0%
		Propyl Acetate	109-60-4	3.00%	1.0%	5.0%
		Isopropyl alcohol	67-63-0	3.00%	1.0%	5.0%
Relton Corporation	New rapid tap chlorinated paraffin	Petroleum Oil	64742-58-1	50.00%		50.0%
REA Elektronik inc.	TPKE-GB 010	Methyl ethyl ketone	78-93-3	75.00%	75.0%	
		N-Methyl-2-pyrrolidone	872-50-4	3.00%		3.0%
		Isopropyl alcohol	67-63-0	6.00%		6.0%
		Nitrocellulose	9004-70-0	9.00%		9.0%
		Titanium dioxide	13463-67-7	4.00%		4.0%
WD-40 Company	WD-40	Hydrotreated light distillate	64742-47-8	37.00%	24.0%	50.0%
		Petroleum Oil	64742-58-1	25.00%		25.0%
		Hydrotreated light naphthenic distillate	64742-53-6	25.00%		25.0%
		Distillates(petroleum), solvent-dewaxed heavy paraffinic	64742-56-9	25.00%		25.0%
		Distillates(petroleum), solvent-dewaxed heavy paraffinic	64742-65-0	25.00%		25.0%

Manufacturer	Material	Ingredient	CAS No.	Concentration (weight percent)	Min	Max
		Hydrotreated light distillate	64742-47-8	15.00%	12.0%	18.0%
Welding Depot	Welding Electrode-AWS E7018	Titanium dioxide	13463-67-7	10.00%		10.0%
		Manganese	7439-96-5	5.00%		5.0%
		Aluminum oxide (fibrous form)	1344-28-1	5.00%		5.0%
		Calcium fluoride	7789-75-5	1.00%		1.0%
Linde	Weld wire 0.045 115 S-6 (Linde S-6, ER70S-6)	Manganese	7439-96-5	1.63%	1.4%	1.9%
Crown	Crown 7043 Wire Rope, Chain and Cable Lube	Solvent naphtha light aliphatic	64742-89-8	27.50%	15.0%	40.0%
		N-Heptane	142-82-5	20.00%	10.0%	30.0%
		Propane	74-98-6	10.00%	7.0%	13.0%
		N-Butane	106-97-8	5.00%	3.0%	7.0%
		Isobutane	75-28-5	3.00%	1.0%	5.0%
Hobart Brothers	Metal-Cor 6 (E70C)	Aluminum (fume or dust)	7429-90-5	2.00%		2.0%
		Calcium fluoride	7789-75-5	5.00%		5.0%
		Manganese	7439-96-5	5.00%		5.0%
Aquarius	Holland Yellow Rust Paint	Solvent naphtha medium aliphatic	64742-88-7	20.00%	10.0%	30.0%
		Light aromatic solvent naphtha	64742-95-6	10.00%	7.0%	13.0%
Castrol	Magnaglide D 68	Hydrotreated light paraffinic distillate	64742-55-8	90.00%	90.0%	
Castrol	Molub-Alloy 860/150-0 ES	Hydrotreated heavy naphthenic distillate	64742-52-5	87.50%	85.0%	90.0%
		Distillates(petroleum), solvent-dewaxed heavy paraffinic	64742-65-0	87.50%	85.0%	90.0%
Welding Depot	AWS E7018 Welding Electrode	Manganese	7439-96-5	5.00%		5.0%
		Aluminum oxide (fibrous form)	1344-28-1	5.00%		5.0%
		Calcium fluoride	7789-75-5	1.00%		1.0%
K-G PACKAGING INC.	OSHA ZINGER PINK	Acetone	67-64-1	27.50%	10.0%	45.0%
		Methyl ethyl ketone	78-93-3	7.50%	5.0%	10.0%
		Xylene (all isomers)	1330-20-7	7.50%	5.0%	10.0%
		Ethylbenzene	100-41-4	3.00%	1.0%	5.0%
		Solvent naphtha light aliphatic	64742-89-8	5.50%	1.0%	10.0%
		Propylene glycol methyl ether acetate	108-65-6	3.00%	1.0%	5.0%
		Hydrotreated light distillate	64742-47-8	3.00%	1.0%	5.0%
		Isobutane	75-28-5	7.50%	5.0%	10.0%
		Propane	74-98-6	20.00%	10.0%	30.0%

Manufacturer	Material	Ingredient	CAS No.	Concentration (weight percent)	Min	Max
Dykem	Opaque Stains-All Colors	n-Butyl acetate	123-86-4	35.00%	30.0%	40.0%
		Ethyl alcohol	64-17-5	25.00%	20.0%	30.0%
		n-Butyl alcohol	71-36-3	15.00%	10.0%	20.0%
		Nitrocellulose	9004-70-0	5.50%	1.0%	10.0%
		Ethyl acetate	141-78-6	5.50%	1.0%	10.0%
		Propyl Acetate	109-60-4	5.50%	1.0%	10.0%
		Isopropyl alcohol	67-63-0	5.50%	1.0%	10.0%
		Ammonium iron(III) hexacyanoferrate(II) hydrate	25869-00-5	5.50%	1.0%	10.0%
K-G PACKAGING INC.	E-SERIES (MIR) ENAMEL SPRAY PAINT (VARIOUS COLOURS)	Acetone	67-64-1	27.50%	10.0%	45.0%
		Methyl ethyl ketone	78-93-3	7.50%	5.0%	10.0%
		Xylene (all isomers)	1330-20-7	7.50%	5.0%	10.0%
		Ethylbenzene	100-41-4	3.00%	1.0%	5.0%
		Solvent naphtha light aliphatic	64742-89-8	5.50%	1.0%	10.0%
		Propylene glycol methyl ether acetate	108-65-6	3.00%	1.0%	5.0%
		Hydrotreated light distillate	64742-47-8	3.00%	1.0%	5.0%
		Isobutane	75-28-5	7.50%	5.0%	10.0%
		Propane	74-98-6	20.00%	10.0%	30.0%
Castrol	Tribol 4020/220-2	Hydrotreated heavy naphthenic distillate	64742-52-5	82.50%	80.0%	85.0%
		Distillates(petroleum), solvent-dewaxed heavy paraffinic	64742-65-0	82.50%	80.0%	85.0%
Toronto Lube Service	PV008-C	Volatile Organic Compounds (VOCs)	NA - M16	100.00%		100.0%
REA Elektronik , Inc.	CL-TKE Cleaner	Methyl ethyl ketone	78-93-3	99.50%		99.5%
Petro-Canada	Peerless OG1 450g	Benzenesulfonic acid, C10-16-alkyl derivs., calcium salts	68584-23-6	5.50%	1.0%	10.0%
		Bis(nonylphenyl)amine	36878-20-3	5.50%	1.0%	10.0%
		Sulfonic acids, petroleum, calcium salts	61789-86-4	5.50%	1.0%	10.0%
		calcium dodecylbenzenesulphonate	26264-06-2	3.00%	1.0%	5.0%
Petro-Canada	Peerless OG1 17kg	Benzenesulfonic acid, C10-16-alkyl derivs., calcium salts	68584-23-6	5.50%	1.0%	10.0%
		Bis(nonylphenyl)amine	36878-20-3	5.50%	1.0%	10.0%
		Sulfonic acids, petroleum, calcium salts	61789-86-4	5.50%	1.0%	10.0%
		calcium dodecylbenzenesulphonate	26264-06-2	3.00%	1.0%	5.0%
Fuchs	Anticorit CPD 5400	Heavy alkylate naphtha	64741-65-7	80.0%	60.0%	100.0%

Natural Gas Combustion Emissions

Annual natural gas consumption 500,729 m³/yr
Smog season natural gas consumption 28,020

COMBUSTION EMISSIONS	Emission Factors				Annual ²
Contaminant Table 2A	CAS	lb/10 ⁶ ft ³ ¹	Rating	kg/10 ⁶ m ³	Discharge (kg/yr)
Carbon dioxide	124-38-9	120,000	A	1,920,000	961,400
Carbon monoxide	630-08-0	84	B	1,344	673
HFC-134A	811-97-2	0	NA	0	0
Methane	74-82-8	2.3	B	37	18
Nitrous oxide (uncontrolled)	10024-97-2	2.2	E	35	18
Oxides of nitrogen (NO ₂) ³	10102-43-9	100	B	1,600	801
- Low NO _x ⁴		50	D	800	
PM - particulate matter	N/A - M08	8	D	122	61
PM10 - particulate matter	N/A - M09	6	D	91	46
PM2.5 - particulate matter	N/A - M10	2	D	30	15
Sulphur dioxide	7446-09-5	0.6	A	10	5
Volatile organic compounds (VOC)	N/A - M16	5.5	C	88	44

Footnotes:

- 1] Reference : USEPA Emission Factor Documentation for AP-42- Section 1.4 Natural Gas Combustion.
- 2] Discharge rate has been calculated using monthly natural gas consumption (see Input Worksheet)
- 3] uncontrolled, small burners
- 4] controlled, low NO_x small burners

* Emissions calculated using "The Natural Gas Combustion Emissions Calculator" obtained from the NPRI Toolbox – General Reporting Tools.

Calculations:

Welding Emissions

Welding	Total (kg/yr)
PM - particulate matter	13.65
PM10 - particulate matter	13.65
PM2.5 - particulate matter	10.24
<i>From "Guidance for the Reporting of Welding Activities" (NPRI Toolbox - General Reporting Tools)</i>	

Release Summary Chart				
Substance	Total Release	Units	Total Release	Units
Chromium and its compounds	0.00	kg	0.000	tonnes
Cobalt and its compounds	0.00	kg	0.000	tonnes
Nickel and its compounds	0.00	kg	0.000	tonnes
Manganese and its compounds	0.83	kg	0.001	tonnes
Hexavalent Chromium compounds	0.00	kg	0.000	tonnes
Lead and its compounds (except tetraethyl lead)	0.00	kg	0.000	tonnes

Cooling Tower Emissions

Cooling Tower 1	Total (kg/yr)
PM - particulate matter	746.10
PM10 - particulate matter	124.39
PM2.5 - particulate matter	3.94
<i>From "Wet Cooling Tower Guidance For Particulate Matter" (NPRI Toolbox - General Reporting Tools)</i>	

Cooling Tower 2	Total (kg/yr)
PM - particulate matter	202.94
PM10 - particulate matter	33.83
PM2.5 - particulate matter	1.07
<i>From "Wet Cooling Tower Guidance For Particulate Matter" (NPRI Toolbox - General Reporting Tools)</i>	

Steel Usage and Emissions

In 2014, the average content of all reportable substances contained within the steel used by Welded Tube is estimated to be below 1% (see list below). Therefore, steel related usages and emissions were not estimated.

Steel Content

Manganese	0.10 - 1.50%
Phosphorous	< 0.035%
Copper	0.01 - 0.30%
Nickel	0.005 - 0.30%
Chromium	0 - 0.55%
Vanadium	0 - 0.10%
Aluminum	0 - 0.080%

Appendix A: Report Submission and Electronic Certification

Report Submission and Electronic Certification

NPRI - Electronic Statement of Certification

Specify the language of correspondence

English

Comments (optional)

I hereby certify that I have exercised due diligence to ensure that the submitted information is true and complete. The amounts and values for the facility(ies) identified below are accurate, based on reasonable estimates using available data. The data for the facility(ies) that I represent are hereby submitted to the programs identified below using the Single Window Reporting Application.

I also acknowledge that the data will be made public.

Note: Only the person identified as the Certifying Official or the authorized delegate should submit the report(s) identified below.

Company Name

SBS W Subco Inc./ZRJ W Subco Inc.

Certifying Official (or authorized delegate)

Franco DiGiovanni

Report Submitted by

Airzone One

I, the Certifying Official or authorized delegate, agree with the statements above and acknowledge that by pressing the "Submit Report(s)" button, I am electronically certifying and submitting the facility report(s) for the identified company to its affiliated programs.

ON MOE TRA - Electronic Certification Statement

Annual Report Certification Statement

TRA Substance List

CAS RN

Substance Name

NA - M16

Volatile Organic Compounds (VOCs)

Company Name

SBS W Subco Inc./ZRJ W Subco Inc.

Highest Ranking Employee

Barry Sonshine

Report Submitted by

Airzone One

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
2014	28/05/2015	Bowes Manufacturing	Ontario	Concord	NPRI, ON MOE TRA

Note: If there is a change in the contact information for the facility, a change in the owner or operator of the facility, if operations at the facility are terminated, or if information submitted for any previous year was mistaken or inaccurate, please update this information through SWIM or by contacting the National Pollutant Release Inventory directly.

Appendix B: 2014 SWIMS Report Preview

Report Preview

Company Details

Name

SBS W Subco Inc./ZRJ W Subco Inc.

Address

111 Rayette, Concord (Ontario)

Report Details

Report Status

Submitted

2014

Report Type

Inventory

Facility Name

Bowes Manufacturing

Facility Address

50 Bowes Road, Concord (Ontario)

Update Comments

Activity Details

Applicable Programs

Please select all that apply.

Environment Canada Programs

☒ NPRI - National Pollutant Release Inventory

Partnering Programs

☒ ON MOE TRA - Ontario Ministry of the Environment for the Toxic Reductions Act

☐ ON MOE Reg. 127/01 - Ontario Ministry of the Environment for the Airborne Contaminant Discharge Monitoring and Reporting Regulation

- ☐ NERM - Chemistry Industry Association of Canada for the National Emission Reduction Masterplan survey
- ☐ NFPRER - National Framework for Petroleum Refinery Emission Reductions

Contacts

Select the appropriate person from the drop-down menu for each contact.

Facility Contacts

Select the appropriate person from the drop-down menu for each contact.

Technical Contact: *

Lucas Neil

Certifying Official (or authorized delegate): *

Franco DiGiovanni

Highest Ranking Employee: *

Barry Sonshine

Person who prepared the report: *

Lucas Neil

Person who coordinated the preparation of the Toxics Reduction Plan (required after a plan summary has been submitted)

Company Coordinator (optional)

Public Contact (optional)

Antonietta Iozzo

Contractor Contact (optional)

If you are an independent contractor or consultant, please enter your company name in the field below

Reasons for adding/removing substances

Substances added to the report

Please indicate the reasons why the following substances were added to the report:

Empty

Substances removed from the report

Please indicate the reasons why the following substances were removed from the report:

CAS RN**Substance Name****Comment: ***

NA - 09

Manganese (and its compounds)

Substance has not been reportable since 2012.

Employees and Activities

Employees

Number of Employees *

193

Activities

If your facility was engaged in any of the following activities, check the relevant box(es), otherwise click "None of the Above". For the second "Activities" list, if you select one of these activities then you must report dioxins, furans and hexachlorobenzene.

Activities for Which the 20,000-Hour Employee Threshold Does Not Apply: (check all that apply) *

None of the above

Activities Relevant to Reporting Dioxins, Furans and Hexachlorobenzene: (check all that apply) *

None of the above

Activities Relevant to Reporting of Polycyclic Aromatic Hydrocarbons (PAHs)

Did the following activity take place at the facility?

Wood preservation using creosote: *

No

General Facility Information

NPRI

Is this the first time the facility is reporting to the NPRI (under current or past ownership)? *

No

Is the facility controlled by another Canadian company or companies? *

Did the facility report under other environmental regulations or permits? *

Is the facility required to report one or more NPRI Part 4 substances (Criteria Air Contaminants)? *

If 'Yes' to reporting for one or more Part 4 substances: Was the facility shut down for more than one week during the year? **

Operating Schedule - Days of the Week **

Mon	Tue	Wed	Thu	Fri	Sat	Sun
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Operating Schedule - Hours **

Usual Number of Operating Hours per day

Usual Daily Start Time (24h) (hh:mm)

Shutdown Periods **

To report a shutdown period, click the "+" sign to the right side of the screen.

Empty

General Comments for Facility

Comments

Verify Facility Information

Company Information

Company Details

Company Legal Name

Business Number

Mailing Address

Delivery Mode

PO Box

Rural Route Number

Address Line 1

City *

Province/Territory **

Postal Code: **

Country *

Facility Information

Facility *

NAICS Code *

NPRI ID *

Facility Physical Address

Address Line 1

City

Province/Territory

Postal Code

Country

Additional Information

Land Survey Description

National Topographical Description

Geographical Address

Latitude **

Longitude **

UTM Zone **

UTM Easting **

621076

UTM Northing **

4851161

Facility Contacts

Contact Types

Technical Contact

First Name: *

Lucas

Last Name: *

Neil

Position: *

Air Quality Scientist

Telephone: *

9058906957

Ext

111

Fax

9058908629

Email: *

lneil@airzoneone.com

Mailing Address

Delivery Mode

General Delivery

PO Box

Rural Route Number

Address Line 1

222 Matheson Blvd East Boulevard

City *

Mississauga

Province/Territory **

Ontario

Postal Code: **

L4Z 1X1

Country *

Canada

Certifying Official

First Name: *

Franco

Last Name: *

DiGiovanni

Position: * Senior Air Quality Modeller

Telephone: * 9058906957

Ext 102

Fax 9058908629

Email: * fdi-giovanni@airzoneone.com

Mailing Address

Delivery Mode General Delivery

PO Box

Rural Route Number

Address Line 1 222 Matheson Boulevard East

City * Mississauga

Province/Territory ** Ontario

Postal Code: ** L4Z 1X1

Country * Canada

Highest Ranking Employee

First Name: * Barry

Last Name: * Sonshine

Position: * Executive Chairman & Co-Chief Executive Officer

Telephone: * 9056691111

Ext 222

Fax

Email: * bsonshine@weldedtube.com

Mailing Address

Delivery Mode	General Delivery
PO Box	
Rural Route Number	
Address Line 1	111 Rayette Road
City *	Concord
Province/Territory **	Ontario
Postal Code: **	L4K 2E9
Country *	Canada

Person who prepared the report

First Name: *	Lucas
Last Name: *	Neil
Position: *	Air Quality Scientist
Telephone: *	9058906957
Ext	111
Fax	9058908629
Email: *	lneil@airzoneone.com

Mailing Address

Delivery Mode	General Delivery
PO Box	
Rural Route Number	
Address Line 1	222 Matheson Blvd East Boulevard
City *	Mississauga

Province/Territory **

Ontario

Postal Code: **

L4Z 1X1

Country *

Canada

Public Contact

First Name: *

Antonietta

Last Name: *

Iozzo

Position: *

Quality Coordinator

Telephone: *

9056691111

Ext

367

Fax

9057384070

Email: *

aiozzo@weldedtube.com

Mailing Address

Delivery Mode

General Delivery

PO Box

Rural Route Number

Address Line 1

111 Rayette Road

City *

Concord

Province/Territory **

Ontario

Postal Code: **

L4K2E9

Country *

Canada

Pollution Prevention

Pollution Prevention Plans

Does the facility have a documented pollution prevention plan? *

Yes

If 'Yes'

a) Please check all that apply

Plan was prepared or implemented on a voluntary basis.

b) Did the facility update their plan in the current reporting year?

No

c) Does the plan address substances, energy conservation, or water conservation?

Please summarize your pollution prevention plan and/or your pollution prevention activities (this information will be publicly available) **

Pollution Prevention Activities

Did the facility complete any pollution prevention activities in the current NPRI reporting year? *

No

Selecting "Yes" will initiate the reporting of the specific pollution prevention activities that were completed in the current reporting year on the following screen.

Substance Details

NA - M16, Volatile Organic Compounds (VOCs)

NA - M16, Volatile Organic Compounds (VOCs)

Substance Reporting Status

Applicable Programs

NPRI - Does this substance meet the criteria specified in the Canada Gazette notice? Selecting "No" indicates voluntary reporting of this substance to the NPRI. *

Yes

ON MOE TRA - Does this substance meet the criteria specified in the Ontario Regulation 455/09 under the TRA? Selecting "No" indicates voluntary reporting of this substance to the ON MOE. *

Yes

Is this considered the first report for this substance to the ON MOE TRA? (Please select "Help" for further clarification) *

No

Would you like to create VOC exit record(s) for this ON MOE TRA substance? *

Comments

General Information about the Substance

Releases and Transfers of the Substance

Releases and Transfers of the Substance

☒ Select the check box if 1 tonne or more of a Part 5 Substance (Speciated VOC) was released to air

TRA Quantifications

Enters the facility (Use), Creation, Contained in Product for ON MOE TRA

Enters the facility (Use)

The amount of substance that enters a process as the substance itself or part of another substance, rolled up at the facility level.

Quantity (Tonnes) **

Volatile Organic Compound (VOC) Breakdown

Details

Enter breakdown values for

Total Speciated VOCs

VOC Substance list *

CAS Number	Substance Name	Quantity (tonnes)
------------	----------------	-------------------

Total VOCs Reported

Total Speciated VOCs

Do you want to use ranges for public reporting? If "No" is selected you are indicating that any report to the public may contain the exact quantity provided. *

Creation

The amount of substance that is created

Quantity (Tonnes) **

Volatile Organic Compound (VOC) Breakdown

Details

Enter breakdown values for

Total Speciated VOCs

VOC Substance list *

CAS Number	Substance Name	Quantity (tonnes)
<input type="text" value="64741-65-7"/>	<input type="text" value="Heavy alkylate naphtha"/>	<input type="text" value="0"/>
<input type="text" value="78-93-3"/>	<input type="text" value="Methyl ethyl ketone"/>	<input type="text" value="0"/>

Total VOCs Reported

Total Speciated VOCs

Do you want to use ranges for public reporting? If "No" is selected you are indicating that any report to the public may contain the exact quantity provided. *

Change in Method of Quantification

☐ There has been a change in the method or combination of methods used to track and quantify the substance during the previous calendar year

Describe the changes **

Select the reason for change: **

Describe how the change impact tracking and quantification of the substance **

Incidents out of the normal course of events

- ☐ There have been incidents out of the normal course of events that occurred at the facility during the previous calendar year that affected the results of tracking/quantification of this substance.

Explain how tracking and quantifications were affected **

Significant Process Change

- ☐ There has been a significant process change at the facility during the previous calendar year.

On-site Releases

Click "Edit" to enter your reportable values. In order to calculate totals, you must click the "Validate" button.

Enter the values for releases to air for the substance

Releases to Air

Category	Basis Of Estimate	Quantity (Tonnes)
Stack or Point Releases	NA - Not Applicable	
Storage or Handling Releases	NA - Not Applicable	
Fugitive Releases	C - Mass Balance	12.2
Spills	NA - Not Applicable	
Other Non-point Releases	NA - Not Applicable	

Total - Releases to Air

Volatile Organic Compound (VOC) Breakdown

Enter the quantity (Tonnes) of volatile organic compounds (VOCs) in the column below, then click "Save and Return". If there are no values for certain VOC species, you may leave those quantity fields blank.

Volatile Organic Compound (VOC) Breakdown

Details

Enter breakdown values for

Other Sources - Speciated VOCs

Quantity (Tonnes)

12.2

Total VOCs Reported

12.2

Total Speciated VOCs

9.99

VOC Substance list *

CAS Number	Substance Name	Quantity (tonnes)
64741-65-7	Heavy alkylate naphtha	8.66
78-93-3	Methyl ethyl ketone	1.33

Total VOCs Reported

12.2

Total Speciated VOCs

9.99

Enter the values for releases to air for Part 5 VOCs

Releases from Other Sources - Speciated VOCs

Click "Edit" to enter release values for speciated VOCs that are from all other categories above including stacks Edit" beside "Stack or Point Releases" in the table above.

Category	Basis Of Estimate	Quantity (Tonnes)
Other Sources - Speciated VOCs	NA - Not Applicable	12.2

Breakdown of Annual Releases

☐ Distribute Equally

Monthly Releases

January %	February %	March %	April %
8.33	8.33	8.34	8.33
May %	June %	July %	August %
8.33	8.34	8.33	8.33
September %	October %	November %	December %
8.34	8.33	8.33	8.34

Total %

100.00

Reasons for Changes in Quantities Released from Previous Year

Select the applicable reason or reasons *

No significant change (i.e. < 10%) or no change

Comments ? (On-Site Releases) **

Comparison Report: Enters, Creation, Contained in Product

Ensure that "Last Reported Quantity" and the "Reporting Period of the last reported quantity" reflect current year's reporting to the last year's values. If you selected the pre-population function, the exact values in your previous year's report will be inserted into the current year's template, including the comparison report. Therefore, you will be required to update all values and texts.

Enters the facility (Use)

Breakdown Substances

CAS RN: 64741-65-7, Substance Name: Heavy alkylate naphtha

Substance Name

Heavy alkylate naphtha

Quantity (Tonnes)

8.66

Last Reported Quantity (Tonnes) *

0

Reporting Period of Last Reported Quantity *

2013

Change

8.66

% Change

100

CAS RN: 78-93-3, Substance Name: Methyl ethyl ketone

Substance Name

Methyl ethyl ketone

Quantity (Tonnes)

1.33

Last Reported Quantity (Tonnes) *

0

Reporting Period of Last Reported Quantity *

2013

Change

1.33

% Change

100

Creation

Breakdown Substances

CAS RN: 64741-65-7, Substance Name: Heavy alkylate naphtha

Substance Name

Heavy alkylate naphtha

Quantity (Tonnes)

0

Last Reported Quantity (Tonnes) *

0

Reporting Period of Last Reported Quantity *

2013

Change

0

% Change

CAS RN: 78-93-3, Substance Name: Methyl ethyl ketone

Substance Name

Methyl ethyl ketone

Quantity (Tonnes)

0

Last Reported Quantity (Tonnes) *

0

Reporting Period of Last Reported Quantity *

2013

Change

0

% Change

Reasons for Change

Reasons for Change

Reason(s) for Change

Other

(please specify)

First year reporting.

(please specify): First year reporting.

Comparison Report: On-site Releases

Ensure that “Last Reported Quantity” and the “Reporting Period of the last reported quantity” reflect current year's reporting to the last year's values. If you selected the pre-population function, the exact values in your previous year's report will be inserted into the current year's template, including the comparison report. Therefore, you will be required to update all values and texts.

Total Releases to Air

Breakdown Substances

CAS RN: 64741-65-7, Substance Name: Heavy alkylate naphtha

Substance Name

Heavy alkylate naphtha

Quantity (Tonnes)

8.66

Last Reported Quantity (Tonnes) *

0

Reporting Period of Last Reported Quantity *

2013

Change

8.66

% Change

100

CAS RN: 78-93-3, Substance Name: Methyl ethyl ketone

Substance Name

Methyl ethyl ketone

Quantity (Tonnes)

1.33

Last Reported Quantity (Tonnes) *

0

Reporting Period of Last Reported Quantity *

2013

Change

1.33

% Change

100

Reasons for Change

Reasons for Change

Reason(s) for Change

Other

(please specify)

First year reporting.

(please specify): First year reporting.

Post Plan Substance Details

64742-48-9, Hydrotreated heavy naphtha

64742-48-9, Hydrotreated heavy naphtha

Objectives, Description and Targets

This information is read-only and is pulled directly from your most recent submitted Plan Summary. To make changes to the information on this screen, please update your plan summary and re-submit. For more details about updating the plan summary, please select "Help".

Objectives

Objectives in plan: *

Although Welded Tube of Canada does not intend to reduce the use of hydrotreated heavy naphtha, they will continue to conduct further research to identify new reduction options (i.e. alternative rust inhibitors) and to keep up with industry standards with regards to hydrotreated heavy naphtha pollution prevention.

Use Targets

What is the targeted reduction in use of the toxic substance at the facility? *

No quantity
target

Quantity

Unit

☒ or

What is the targeted timeframe for this reduction? *

No timeline target years

☒ or

Description of Target

Creation Targets

What is the targeted reduction in creation of the toxic substance at the facility? *

No quantity target Quantity Unit

☒ or

What is the targeted timeframe for this reduction? *

No timeline target years

☒ or

Description of targets

Actions

Additional Actions

Were there any additional actions outside the plan taken during the reporting period to reduce the use and/or creation of the substance? *

Yes

Describe any additional actions that were taken during the reporting period to achieve the plan's objectives: **

Welded Tube switched anti-rust coatings to a product that does not contain Hydrotreated Heavy Naphtha.

Provide a public summary of the description of the additional action taken: **

Welded Tube switched anti-rust coatings to a product that does not contain Hydrotreated Heavy Naphtha.

Reductions due to additional actions taken **

The amount of reduction in **use** of the substance at the facility during the reporting period that resulted due to the additional actions.

☐ No Amount

tonnes

The amount of reduction in **creation** of the substance at the facility during the reporting period that resulted due to the additional actions.

☒ No Amount

tonnes

The amount of reduction in the substance **contained in product** at the facility during the reporting period that resulted due to the additional actions.

☒ No Amount

tonnes

The amount of reduction in **release to air** of the substance at the facility during the reporting period that resulted due to the additional actions.

☐ No Amount

tonnes

The amount of reduction in **release to water** of the substance at the facility during the reporting period that resulted due to the additional actions.

☒ No Amount

tonnes

The amount of reduction in **release to land** of the substance at the facility during the reporting period that resulted due to additional actions.

☒ No Amount

tonnes

The amount of reduction in the substance **disposed on-site** (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.

☒ No Amount

tonnes

The amount of reduction in the substance **disposed off-site** (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.

☒ No Amount

tonnes

The amount of reduction in the substance **recycled off-site** at the facility during the reporting period that resulted due to the additional actions.

☒ No Amount

tonnes

Amendments

Amendments

Were any amendments made to the toxic substance reduction plan during the reporting period? *

Description any amendments that were made to the toxic substance reduction plan during the reporting period **

Provide a public summary of the description of any amendments that were made to the toxic substance reduction plan during the reporting period **