Toxics Reduction Plan - Summary

Hydrotreated Heavy Naphtha CAS # - 64742-48-9

Prepared for:

Welded Tube of Canada 50 Bowes Road Concord, Ontario L4H 1H3

Prepared by:

Airzone One Ltd. 222 Matheson Blvd E Mississauga, ON L4Z 1X1

1.0 Introduction

1.1. General Information

The facility is located at 50 Bowes Road, Concord, Ontario. This plan summary is for Hydrotreated Heavy Naphtha (CAS# - 64742-48-9).

Hydrotreated heavy naphtha is one of the main constituents of the anti-rust coating that is applied to the steel tubes and pipes produced at the facility before they are shipped to customers. The Facility manufactures steel tubes and pipes, where the rust inhibitor is used to prevent the formation of rust and help maintain the strength and durability of the final product.

Table 1-1 - General Facility Information

NPRI Number	5698
O Reg 127/01 Number	5838
Number of full time employee equivalents	221
NAICS Code (2 digit)	31-33 – Manufacturing
NAICS Code (4 digit)	3312 - Steel product manufacturing from
	purchased steel
NAICS Code (6 digit)	331210 - Iron and steel pipes and tubes
	manufacturing from purchased steel
UTM Coordinates	17 T 621076 m E 4851161 m N
Company Legal Name	Welded Tube of Canada
Company Trade Name	Welded Tube of Canada

1.2. Plan Contacts

Public Contact

Antonietta Iozzo
Quality Coordinator

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2.0 <u>Facility's Intent, Objectives and Targets</u>

2.1. Use

The act requires that a facility include a statement of intent to reduce the use of the prescribed toxic substance. If the facility does not provide a statement of intent it must provide a reason why it does not intend or why it is not possible to reduce the use of the toxic substance. In addition to this, the facility is required to provide a list of objectives.

Statement of intent:

The facility does not have a statement of intent. However, Welded Tube of Canada does intend to continue to monitor current research on the availability and feasibility of alternative rust inhibitors.

Reason why the facility does not have a statement of intent: (if applicable)

Welded Tube of Canada does not intend to reduce hydrotreated heavy naphtha because there are no further reduction options possible at this time.

Objectives: (a list of objectives to reduce if any)

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.

Quantity Target: (if any)

No target

Target Timeline: (if any can be expressed in years or described in text box, or no timeline can be selected)

No timeline

Reason why toxic substance is used at the facility: (from drop down menu options)

For on-site use/processing.

2.2. Creation

The act requires that a facility include a statement of intent to reduce the creation of the prescribed toxic substance. If the facility does not provide a statement of intent it must provide a reason why it does not intend or why it is not possible to reduce the creation of the toxic substance.

Statement of intent:

The facility does not have a statement of intent.

Reason why the facility does not have a statement of intent:

The facility does not create the subject substances at the facility; therefore it is not required to provide a statement of intent on the creation of this substance.

Objectives:

N/A

Quantity Target:

N/A

Target Timeline:

N/A

Reason why toxic substance is used at the facility:

N/A.

3.0 Facility's Goals

There are no reasonable substitutions for this substance and many of the reduction options possible have already been implemented in the past.

4.0 Facility TRA Plan (info)

This plan summary is accurate, up to date and reflects the current facility version of the Toxic Reduction Plan.

5.0 Signed Certification Statements

Certification by highest ranking employee

As of <u>December 11th</u>, 2018 [date], I, <u>John Young</u>, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and the plan complies with the *Toxics Reduction Act*, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Hydrotreated Heavy Naphtha

Signed:

John Young

Certification by toxic substance reduction planner

As of <u>December 11th, 2018</u> [*date*], I, <u>Franco DiGiovanni</u>, certify that I am familiar with the processes at <u>Welded Tube of Canada</u> that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the *Toxics Reduction Act*, 2009 that are set out in the plan dated <u>December 11th, 2018</u> [*version date*] and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Hydrotreated Heavy Naphtha

Signed:

Franco DiGiovanni

Airzone One Ltd.