

GKN SINTER METALS LTD.
7 MICHIGAN BLVD., ST THOMAS, ONTARIO N5P 1H1

TOXICS REDUCTION ACT
TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES
2012

REPORT PREPARED BY:
O2E INC.

REPORT PREPARED FOR:
PATRICK AMBROSE
GKN SINTER METALS

JULY 8, 2013

LONDON

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ONTARIO

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CANADA



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1. PLAN SUMMARY – COPPER (AND ITS COMPOUNDS)

Name and CASRN of Substance	Copper (and its compounds)	Not Applicable
	Nickel (and its compounds)	Not Applicable

1.1 Basic Facility Information

Basic facility information has been included in Section 3 of this document.

1.2 Toxic Reduction Policy Statement of Intent

GKN Sinter Metals plant is a ferrous parts facility that manufactures parts for the automotive industry. We are committed to providing a safe working environment to employees and are playing our part in protecting the environment. Copper and its compounds are currently purchased and used as an alloy at the plant in the processing of parts for the automotive industry. Whenever technically and economically feasible we intend to reduce the use, and release of Copper (and its compounds) in full compliance with all federal and provincial regulations. Toxic use reduction will be an ongoing effort for GKN; they will continue to evaluate all options available to achieve this.

1.3 Reduction Objectives

All employees at GKN will be involved in the reduction of toxic substance use, creation and releases. Our goal is to reduce the use and release of Copper (and its compounds) where technically and economically feasible.

1.4 Description of Substance

Copper (and its compounds) are found in raw materials as well as scrap metal purchased by the facility. GKN Sinter Metals produces motor vehicle transmission and power train parts in which Copper (and its compounds) is a major component.

1.5 Toxic Substance Reduction Option to be Implemented

The following option has been identified for implementation to reduce the use and release of Copper (and its compounds):

- Product Reformulation– Increasing compaction tonnage

Copper (and its compounds) reductions due to implementing the options above are as follows:

Company Name: GKN Sinter Metals

Substance: Copper (and its compounds)

CASRN: Not applicable

Reduction Option: Product Reformulation– Increasing compaction tonnage

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	87.014	0	74.090	0.004	0	0	0	0	12.920
Estimated reduced amount	86.144	0	73.349	0.00396	0	0	0	0	12.791
Reduction	0.87	0	0.741	3.9E-05	0	0	0	0	0.129
% Reduction	1%	NA	1%	1%	NA	NA	NA	NA	1%

Note: All values are presented in kilograms (Mg) per year unless noted.

1.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Copper (and its compounds), prepared on behalf of GKN Sinter Metals Limited, and dated July 8, 2013.

1.7 Copy of Plan Certification

A copy of the plan certification is presented in Section 4 of this document.

2. PLAN SUMMARY – NICKEL (AND ITS COMPOUNDS)

Name and CASRN of Substance	Nickel (and its compounds)	Not Applicable
	Copper (and its compounds)	Not Applicable

2.1 Basic Facility Information

Basic facility information has been included in Section 3 of this document.

2.2 Toxic Reduction Policy Statement of Intent

At GKN Sinter Metals, we are committed to providing a safe working environment to employees and are playing our part in protecting the environment. Nickel (and its compounds) are currently purchased and used at the plant in the production of motor vehicle transmission and power train parts via a sintering process. As this is an integral component of these alloys we are unable to reduce the use of Nickel but will ensure sound management and use of this substance that minimizes significant adverse impacts on human health and the environment.

2.3 Reduction Objectives

GKN Sinter Metals Limited is unable to reduce the use of Nickel (and its compounds) as it is an integral component of some of the alloys produced by the facility. However, we will ensure the sound management and use of this substance that minimizes significant adverse impacts on human health and the environment.

2.4 Description of Substance

Nickel (and its compounds) are found in raw materials as well as scrap metal purchased by the facility. GKN Sinter Metals produces motor vehicle transmission and power train parts in which Nickel (and its compounds) is a major component.

2.5 Toxic Substance Reduction Option to be Implemented

There are currently no options identified for implementation to reduce the use and release of Nickel (and its compounds).

2.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Nickel (and its compounds), prepared on behalf of GKN Sinter Metals Limited, and dated June 18, 2013.

2.7 Copy of Plan Certification

A copy of the plan certification is presented in Section 4 of this document.

3. BASIC FACILITY INFORMATION

Facility Identification and Site Address		
Company Name	GKN Sinter Metals Limited	
Facility Name	GKN Sinter Metals Limited	
Facility Address	Physical Address:	Mailing Address
	7 Michigan Boulevard St. Thomas, ON N5P 1H1	7 Michigan Boulevard St. Thomas, ON N5P 1H1
Spatial Coordinates (UTM)	486820	4736487
Datum	WGS84	
Number of Employees	175	
NPRI ID	01461	
ON MOE ID		
Parent Company Information		
Parent Company Name & Address	GKN Sinter Metals 7 Michigan Boulevard St. Thomas, ON N5P 1H1	
Percent Ownership	100%	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 Manufacturing	
4 Digit NAICS Code	3363 - Motor Vehicle Parts Mfg.	
6 Digit NAICS Code	336350 - MV Transmission & Power Train Parts Mfg.	
Company Contact Information		
Facility Public Contact	Patrick Ambrose HSE Specialist	Contact Address
	Patrick.Ambrose@gknsintermetals.com	GKN Sinter Metals 7 Michigan Boulevard St. Thomas, ON N5P 1H1
	Phone: 519-631-4880	
	Fax: 519-631-6552	

4. COPY OF PLAN CERTIFICATION

Rationale Statement – Highest Ranking Employee

Submission of the required plan summaries and certification statements via the Environment Canada Single Window Information Manager (SWIM) system has been delayed as a result of the investigation and assessment of reduction options taking longer than anticipated to complete. Rather than compromise the integrity of the report and results by rushing the assessment to meet the deadline, we have chosen to take the time to properly evaluate all options we believe to be currently available for our operations. As such, submission of the required elements of the toxic substance reduction plans could not be made by the regulatory deadline.

Confirmation by the Highest Ranking Employee

As of 10 July 2013 I, Kristina Schmitt, confirm that I have read the toxic substance reduction plans dated July 8, 2013 for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and, with the exception of the regulatory deadline, comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Nickel (and its compounds) Copper (and its compounds)



Kristina Schmitt
Plant Manager, GKN Sinter Metals



Confirmation by Licensed Planner

As of July 10, 2013, I, Tim Logan certify that I am familiar with the processes at GKN Sinter Metals, St. Thomas facility that use or create the toxic substances 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 plans dated July 8, 2013 and that the plans, with the exception of the regulatory deadline, comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Nickel (and its compounds) Copper (and its compounds)



Tim Logan (License No. TSRP0003)
President, O2E Inc. Environmental Consultants