

INGOT METAL COMPANY LIMITED

111 FENMAR DRIVE, WESTON, ONTARIO M9L 1M3

TOXICS REDUCTION ACT TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES 2013

REPORT PREPARED BY:
O2E INC.

REPORT PREPARED FOR:
IVAN BETCHERMAN
INGOT METAL COMPANY LIMITED

NOVEMBER 28, 2013

LONDON

•

ONTARIO

•

CANADA

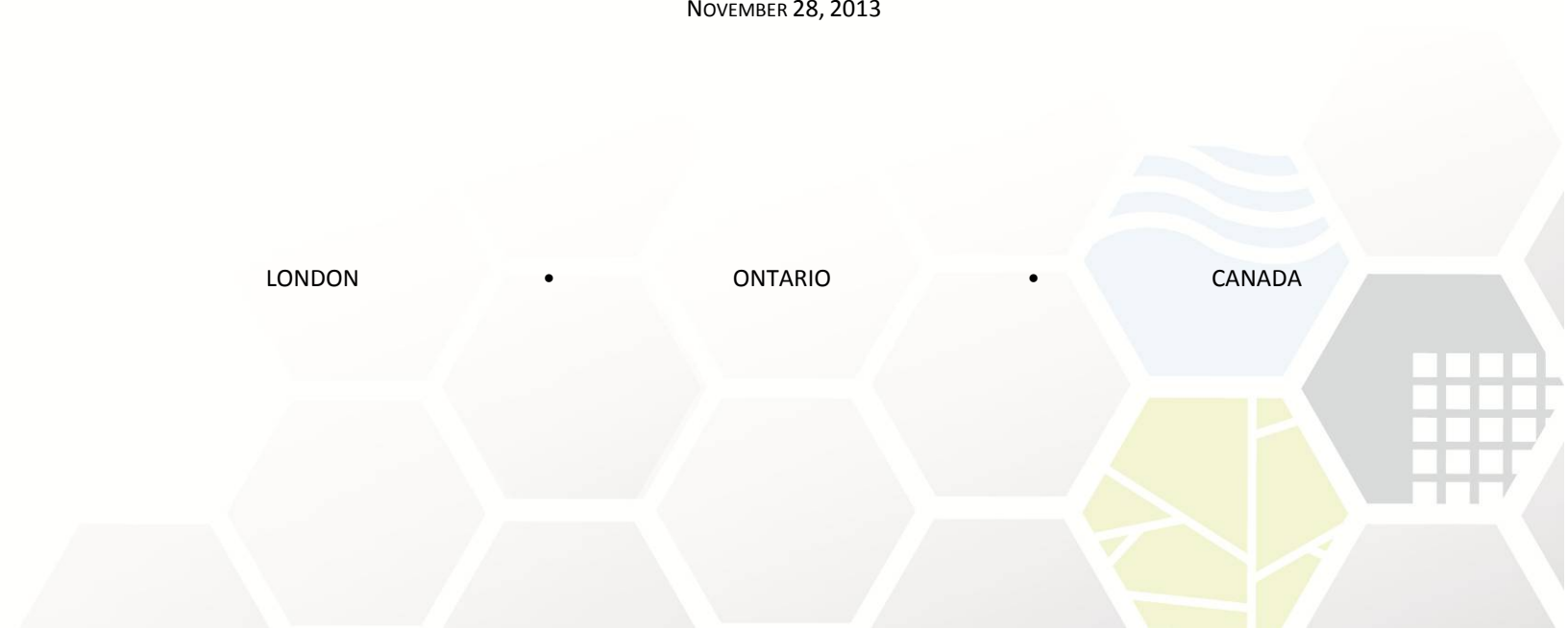


Table of Contents

1.	PLAN SUMMARY – LEAD (AND ITS COMPOUNDS)	1
1.1	Basic Facility Information	1
1.2	Toxic Reduction Policy Statement.....	1
1.3	Reduction Objectives	2
1.4	Description of Substance	2
1.5	Toxic Substance Reduction Option to be Implemented	2
1.6	Plan Summary Statement.....	2
1.7	Copy of Plan Certification.....	2
2.	PLAN SUMMARY – PARTICULATE MATTER ≤ 2.5 MICRONS (PM _{2.5})	3
2.1	Basic Facility Information	3
2.2	Toxic Reduction Policy Statement.....	3
2.3	Reduction Objectives	4
2.4	Description of Substance	4
2.5	Toxic Substance Reduction Option to be Implemented	4
2.6	Plan Summary Statement.....	4
2.7	Copy of Plan Certification.....	4
3.	PLAN SUMMARY – PARTICULATE MATTER ≤ 10 MICRONS.....	5
3.1	Basic Facility Information	5
3.2	Toxic Reduction Policy Statement.....	5
3.3	Reduction Objectives	6
3.4	Description of Substance	6
3.5	Toxic Substance Reduction Option to be Implemented	6
3.6	Plan Summary Statement.....	6
3.7	Copy of Plan Certification.....	6
4.	BASIC FACILITY INFORMATION	7
5.	COPY OF PLAN CERTIFICATION	8

1. PLAN SUMMARY – LEAD (AND ITS COMPOUNDS)

Name and CASRN of Substance	Lead (and its compounds)	NA-08
Substances for which other plans have been prepared	Hexachlorobenzene	118-74-1
	PCCD/F	Not Applicable
	2,3,7,8 -TCCD	1746-01-6
	1,2,3,7,8 - PeCDD	40321-76-4
	1,2,3,4,7,8 - HxCDD	39227-28-6
	1,2,3,6,7,8 - HxCDD	57653-85-7
	1,2,3,7,8,9 - HxCDD	19408-74-3
	1,2,3,4,6,7,8 - HpCDD	35822-46-9
	OCDD	3268-87-9
	2,3,7,8 - TCDF	51207-31-9
	2,3,4,7,8 - PeCDF	57117-31-4
	1,2,3,7,8 - PeCDF	57117-41-6
	1,2,3,4,7,8 - HxCDF	70648-26-9
	1,2,3,7,8,9 - HxCDF	72918-21-9
	1,2,3,6,7,8 - HxCDF	57117-44-9
	2,3,4,6,7,8 - HxCDF	60851-34-5
	1,2,3,4,6,7,8 - HpCDF	67562-39-4
	1,2,3,4,7,8,9 - HpCDF	55673-89-7
	OCDF	39001-02-0
	Copper (and its compounds)	NA-06
	Manganese (and its compounds)	NA-09
	Nickel (and its compounds)	NA-11
	Zinc (and its compounds)	NA-14
Particulate Matter ≤2.5 Microns	NA-M10	
Particulate Matter ≤10 Microns	NA-M09	

1.1 Basic Facility Information

Basic facility information has been included in Section 4 of this document.

1.2 Toxic Reduction Policy Statement of Intent

Ingot Metal Company Limited has been a manufacturer of brass and bronze ingots for over sixty years. Our aim is to provide foundries with the highest quality ingot available, at competitive prices. Lead (and its compounds) are currently purchased and used at the plant in the processing of copper based alloys. As this is an integral component of these alloys we are unable to reduce the use of Lead (and its compounds) but will ensure sound management and use of this substance that minimizes significant adverse impacts on human health and the environment.

1.3 Reduction Objectives

Ingot Metal Company Limited is unable to reduce the use of Lead (and its compounds) as it is an integral component 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. Ingot does implement end of pipe controls which typically obtain a high removal efficiency which greatly minimizes any releases of this substance to the environment. The facility will continue to monitor new technological advancements to ensure that reduction options that are both technological and financially viable are implemented at our facility.

1.4 Description of Substance

Lead (and its compounds) are contained in the scrap metal purchased by the facility. Liquid metal as well as by-products such as slag and dust contain this substance. Lead is contained in a molten alloy prior to moving to the casting and cooling process at the facility. The final step is the casting of the ingots in which molten metal containing Lead (and its compounds) are poured into permanent moulds that are attached to a conveyor. The ingots are cooled on a water-cooled conveyor prior to shipment.

1.5 Toxic Substance Reduction Option to be Implemented

There are currently no options that have been determined to be both technically and economically feasible for this substance.

1.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Lead (and its compounds), prepared on behalf of Ingot Metal Company dated November 28, 2013.

1.7 Copy of Plan Certification

A copy of the plan certification is presented in Section 5 of this document.

2. PLAN SUMMARY – PARTICULATE MATTER ≤2.5 MICRONS (PM_{2.5})

Name and CASRN of Substance	Particulate Matter ≤2.5 Microns	NA-M10
Substances for which other plans have been prepared	Hexachlorobenzene	118-74-1
	PCCD/F	Not Applicable
	2,3,7,8 -TCCD	1746-01-6
	1,2,3,7,8 - PeCDD	40321-76-4
	1,2,3,4,7,8 - HxCDD	39227-28-6
	1,2,3,6,7,8 - HxCDD	57653-85-7
	1,2,3,7,8,9 - HxCDD	19408-74-3
	1,2,3,4,6,7,8 - HpCDD	35822-46-9
	OCDD	3268-87-9
	2,3,7,8 - TCDF	51207-31-9
	2,3,4,7,8 - PeCDF	57117-31-4
	1,2,3,7,8 - PeCDF	57117-41-6
	1,2,3,4,7,8 - HxCDF	70648-26-9
	1,2,3,7,8,9 - HxCDF	72918-21-9
	1,2,3,6,7,8 - HxCDF	57117-44-9
	2,3,4,6,7,8 - HxCDF	60851-34-5
	1,2,3,4,6,7,8 - HpCDF	67562-39-4
	1,2,3,4,7,8,9 - HpCDF	55673-89-7
	OCDF	39001-02-0
	Copper (and its compounds)	NA-06
	Manganese (and its compounds)	NA-09
	Nickel (and its compounds)	NA-11
	Zinc (and its compounds)	NA-14
	Lead (and its compounds)	NA-08
	Particulate Matter ≤10 Microns	NA-M09

2.1 Basic Facility Information

Basic facility information has been included in Section 4 of this document.

2.2 Toxic Reduction Policy Statement of Intent

Ingot Metal Company Limited has been a manufacturer of brass and bronze ingots for over sixty years. Our aim is to provide foundries with the highest quality ingot available, at competitive prices. Particulate Matter ≤2.5 Microns (PM_{2.5}) is generated by the metal melting and alloying as well as natural gas combustion activities at the Facility. All of these activities are deemed integral part of Ingot's operations and are currently controlled using "end of pipe" controls which reduce the release of PM_{2.5} to the atmosphere. Whenever technically and economically feasible they intend to reduce the use, and release of Particulate Matter ≤ 2.5 microns (PM_{2.5}) in full compliance with all federal and provincial regulations. Toxic use reduction will be an

ongoing effort for the company; we will continue to evaluate all options available to achieve this goal.

2.3 Reduction Objectives

The reduction of toxic substance use, creation and releases is a priority for Ingot Metal Company forming part of our sustainability programs and EMS. Our goal is to reduce the creation and release of PM_{2.5} where technically and economically feasible. No technically and economically feasible reduction options for reducing PM_{2.5} were identified. We will continue to monitor new technological advancements to ensure that reduction options that are both technologically and financially viable are implemented at our facility.

2.4 Description of Substance

PM_{2.5} is believed to be created during charging, backcharging, alloying, slag removal and tapping operations within the rotary furnaces. PM_{2.5} is released to the atmosphere by the baghouse controlling suspended particulate matter and metals emissions from the rotary furnace. Particulate matter is also believed to be created when large molecular weight hydrocarbons are not fully combusted within the natural gas fired combustion equipment.

2.5 Toxic Substance Reduction Option to be Implemented

There are currently no options that have been determined to be both technically and economically feasible for this substance.

2.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Particulate Matter ≤2.5 Microns, prepared on behalf of Ingot Metal Company, and dated November 28, 2013.

2.7 Copy of Plan Certification

A copy of the plan certification is presented in Section 5 of this document.

3. PLAN SUMMARY – PARTICULATE MATTER ≤10 MICRONS

Name and CASRN of Substance	Particulate Matter ≤10 Microns	NA-M09
Substances for which other plans have been prepared	Hexachlorobenzene	118-74-1
	PCCD/F	Not Applicable
	2,3,7,8 -TCDD	1746-01-6
	1,2,3,7,8 - PeCDD	40321-76-4
	1,2,3,4,7,8 - HxCDD	39227-28-6
	1,2,3,6,7,8 - HxCDD	57653-85-7
	1,2,3,7,8,9 - HxCDD	19408-74-3
	1,2,3,4,6,7,8 - HpCDD	35822-46-9
	OCDD	3268-87-9
	2,3,7,8 - TCDF	51207-31-9
	2,3,4,7,8 - PeCDF	57117-31-4
	1,2,3,7,8 - PeCDF	57117-41-6
	1,2,3,4,7,8 - HxCDF	70648-26-9
	1,2,3,7,8,9 - HxCDF	72918-21-9
	1,2,3,6,7,8 - HxCDF	57117-44-9
	2,3,4,6,7,8 - HxCDF	60851-34-5
	1,2,3,4,6,7,8 - HpCDF	67562-39-4
	1,2,3,4,7,8,9 - HpCDF	55673-89-7
	OCDF	39001-02-0
	Copper (and its compounds)	NA-06
	Manganese (and its compounds)	NA-09
	Nickel (and its compounds)	NA-11
	Zinc (and its compounds)	NA-14
	Lead (and its compounds)	NA-08
	Particulate Matter ≤2.5 Microns	NA-M10

3.1 Basic Facility Information

Basic facility information has been included in Section 4 of this document.

3.2 Toxic Reduction Policy Statement of Intent

Ingot Metal Company Limited has been a manufacturer of brass and bronze ingots for over sixty years. Our aim is to provide foundries with the highest quality ingot available, at competitive prices. Particulate Matter ≤10 Microns (PM₁₀) is generated by the metal melting and alloying as well as natural gas combustion activities at the Facility. All of these activities are deemed integral part of Ingot’s operations and are currently controlled using “end of pipe” controls which reduce the release of PM₁₀ to the atmosphere. Whenever technically and economically feasible they intend to reduce the use, and release of Particulate Matter ≤ 10 microns (PM₁₀) in

full compliance with all federal and provincial regulations. Toxic use reduction will be an ongoing effort for the company; we will continue to evaluate all options available to achieve this goal.

3.3 Reduction Objectives

The reduction of toxic substance use, creation and releases is a priority for Ingot Metal Company forming part of our sustainability programs and EMS. Our goal is to reduce the creation and release of PM₁₀ where technically and economically feasible. No technically and economically feasible reduction options for reducing PM₁₀ were identified. We will continue to monitor new technological advancements to ensure that reduction options that are both technologically and financially viable are implemented at our facility.

3.4 Description of Substance

PM₁₀ is believed to be created during charging, backcharging, alloying, slag removal and tapping operations within the rotary furnaces. PM₁₀ is released to the atmosphere by the baghouse controlling suspended particulate matter and metals emissions from the rotary furnace. Particulate matter is also believed to be created when large molecular weight hydrocarbons are not fully combusted within the natural gas fired combustion equipment.

3.5 Toxic Substance Reduction Option to be Implemented

There are currently no options that have been determined to be both technically and economically feasible for this substance.

3.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Particulate Matter ≤10 Microns, prepared on behalf of Ingot Metal Company, and dated November 28, 2013.

3.7 Copy of Plan Certification

A copy of the plan certification is presented in Section 5 of this document.

4. BASIC FACILITY INFORMATION

Facility Identification and Site Address		
Company Name	Ingot Metal Company Limited	
Facility Name	Ingot Metal Company Limited	
Facility Address	Physical Address:	Mailing Address
	111 Fenmar Drive Weston, Ontario M9L 1M3	111 Fenmar Drive Weston, Ontario M9L 1M3
Spatial Coordinates (UTM)	616788.6	4846150
Datum	WGS84	
Number of Employees	25	
NPRI ID	00455	
ON MOE ID	6337	
Parent Company Information		
Parent Company Name & Address	Ingot Metal Company Limited 111 Fenmar Drive Weston, ONTARIO M9L 1M3	
Percent Ownership	100%	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 Manufacturing	
4 Digit NAICS Code	3314 – Non-Ferrous (exc. Al) Production & Processing	
6 Digit NAICS Code	331410 – Non-Ferrous (except Al) Smelting & Refining	
Company Contact Information		
Facility Public Contact	Ivan Betcherman Vice President	Contact Address
	ivan@ingot.ca	Ingot Metal Company Limited 111 Fenmar Drive Weston, Ontario M9L 1M3
	Phone: (416) 749-1372	
	Fax: (416) 749-1371	

5. COPY OF PLAN CERTIFICATION

Certification by the Highest Ranking Employee

As of December 3, 2013, I, Ivan Betcherman, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Lead (and its compounds)

Particulate Matter ≤ 10 Microns

Particulate Matter ≤ 2.5 Microns



Ivan Betcherman
Vice President, Ingot Metal Company Limited

Certification by Licensed Planner


As of December 3, 2013, I, Tim Logan certify that I am familiar with the processes at Ingot Metal Company Limited, Weston's 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 November 28, 2013 and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Lead (and its compounds)

Particulate Matter ≤ 10 Microns

Particulate Matter ≤ 2.5 Microns



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