

KAISER ALUMINUM CANADA LTD.

3021 GORE ROAD, LONDON, ONTARIO N5V 5A9

TOXICS REDUCTION ACT TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES 2013

REPORT PREPARED BY:
O2E INC.

REPORT PREPARED FOR:
KAISER ALUMINUM CANADA LTD.

JANUARY 7, 2014

LONDON

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CANADA



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

Name and CASRN of Substance	Particulate Matter ≤2.5 Microns	NA-10
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
	Particulate Matter ≤10 Microns	NA-09

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

Kaiser Aluminum manages their business for long-term success in a manner that is economically, environmentally and socially responsible. They demonstrate this through operating their business with honesty and integrity, providing a safe workplace environment that fosters dignity and respect, creating a positive economic impact for their stakeholders, supporting the sustainability of the environment and striving to make a positive difference in their local communities.

Kaiser Aluminum is committed to protecting the health and safety of their employees and to supporting the sustainability of the environment. Whenever possible Kaiser Aluminum intends to reduce the creation 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 Kaiser Aluminum; they will continue to evaluate all options available to achieve this goal.

1.3 Reduction Objectives

The reduction of toxic substance use, creation and releases is a priority for Kaiser Aluminum forming part of their sustainability programs and EMS. Their 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. Kaiser Aluminum will continue to monitor new technological advancements to ensure that reduction options that are both technologically and financially viable are implemented at their facility.

1.4 Description of Substance

PM_{2.5} is created as a by-product of several facility operations including natural gas combustion, aluminum melting and alloying, aluminum casting and cooling and billet extrusion and fabrication.

1.5 Toxic Substance Reduction Option to be Implemented

There are currently no options identified for implementation to reduce the creation and release of PM_{2.5} that are both technically and economically feasible at this time. Kaiser Aluminum will continue to monitor new technological advancements to ensure that reduction options that are both technologically and financially viable are implemented at their facility.

1.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for PM_{2.5}, prepared on behalf of Kaiser Aluminum, and dated February 7, 2014.

1.7 Copy of Plan Certification

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

2. PLAN SUMMARY – PARTICULATE MATTER ≤10 MICRONS (PM₁₀)

Name and CASRN of Substance	Particulate Matter ≤10 Microns	NA-09
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
		Particulate Matter ≤2.5 Microns

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

Kaiser Aluminum manages their business for long-term success in a manner that is economically, environmentally and socially responsible. They demonstrate this through operating their business with honesty and integrity, providing a safe workplace environment that fosters dignity and respect, creating a positive economic impact for their stakeholders, supporting the sustainability of the environment and striving to make a positive difference in their local communities.

Kaiser Aluminum is committed to protecting the health and safety of their employees and to supporting the sustainability of the environment. Whenever possible Kaiser Aluminum intends to reduce the creation 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 Kaiser Aluminum; they 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 Kaiser Aluminum forming part of their sustainability programs and EMS. Their 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. Kaiser Aluminum will continue to monitor new technological advancements to ensure that reduction options that are both technologically and financially viable are implemented at their facility.

2.4 Description of Substance

PM₁₀ is created as a by-product of several facility operations including natural gas combustion, aluminum melting and alloying, aluminum casting and cooling and billet extrusion and fabrication.

2.5 Toxic Substance Reduction Option to be Implemented

There are currently no options identified for implementation to reduce the creation and release of PM_{2.5} that are both technically and economically feasible at this time. Kaiser Aluminum will continue to monitor new technological advancements to ensure that reduction options that are both technologically and financially viable are implemented at their facility.

2.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for PM₁₀, prepared on behalf of Kaiser Aluminum, and dated February 7, 2014.

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	Kaiser Aluminum Inc.	
Facility Name	Kaiser Aluminum Inc.	
Facility Address	Physical Address:	Mailing Address
	3021 Gore Road London, ON N5V 5A9	3021 Gore Road London, ON N5V 5A9
Spatial Coordinates (UTM)	488513	4759340.34
Datum	WGS84	
Number of Employees	200	
NPRI ID	5649	
ON MOE ID		
Parent Company Information		
Parent Company Name & Address	Kaiser Aluminum Inc. 3021 Gore Road London, ON N5V 5A9	
Percent Ownership	100%	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 Manufacturing	
4 Digit NAICS Code	3313 - Alumina and aluminum production and processing	
6 Digit NAICS Code	33131 - Alumina and aluminum production and processing	
Company Contact Information		
Facility Public Contact	Les Charlton Environmental, Health and Safety Manager	Contact Address 3021 Gore Road London, ON N5V 5A9
	Les.Charlton@kaiseral.com	Kaiser Aluminum Inc.
	Phone: (519) 457-3610	3021 Gore Road
	(519) 457-3610	London, ON N5V 5A9

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.

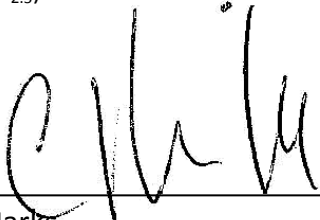
Confirmation by the Highest Ranking Employee

As of February 7, 2014, I, Cindy Marks, confirm 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, 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:

Particulate Matter \leq 2.5 microns
(PM_{2.5})

Particulate Matter \leq 10 microns
(PM₁₀)



Cindy Marks
Plant Manager
Kaiser Aluminum Canada Limited

Confirmation by Licensed Planner

As of February 7, 2014, I, Tim Logan confirm that I am familiar with the processes at Kaiser Aluminum 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 February 7, 2014 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:

Particulate Matter \leq 2.5 microns
(PM_{2.5})

Particulate Matter \leq 10 microns
(PM₁₀)



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