

VARI-FORM INCORPORATED PLANT B

250 LOTHIAN AVENUE, STRATHROY, ONTARIO, N7G 4J7

TOXICS REDUCTION ACT TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES 2013

REPORT PREPARED BY:
O2E INC.

REPORT PREPARED FOR:
VARI-FORM INCORPORATED

DECEMBER 10, 2013

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CANADA

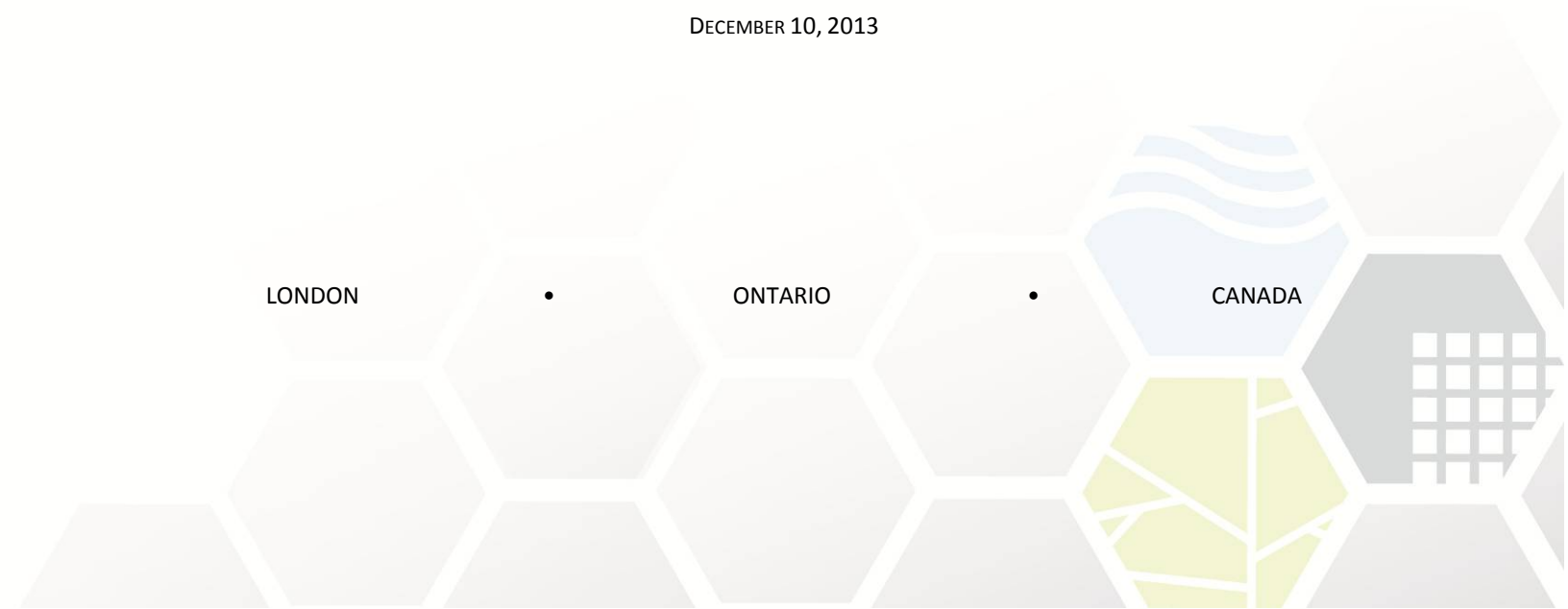


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1. PLAN SUMMARY – PARTICULATE MATTER ≤2.5 MICRONS (PM_{2.5})

Name and CASRN of Substance	Particulate Matter ≤2.5 microns (PM _{2.5})	NA-10
Substances for which other plans have been prepared	Particulate Matter ≤10 Microns (PM ₁₀)	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

Vari-Form is a leader in pressure-sequence hydroforming for high-performance structural parts. Headquartered in Troy, Michigan, with production facilities in Strathroy, Ontario, Reynosa, Mexico, Liberty, Missouri, Vari-Form originated the concept and application of hydroforming body, chassis and other structural parts. Vari-Form's technology is used to manufacture more than 7 million parts a year worldwide. The company began volume production using its patented, production-validated Pressure-Sequence Hydroforming (PSH) process in 1990. Vari-Form is the industry leader and has produced more than 100 million parts to date.

Wherever feasible, Vari-Form Inc. will reduce the creation and release of Particulate Matter ≤2.5 Microns (PM_{2.5}) in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Vari-Form and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

1.3 Reduction Objectives

The reduction of toxic substance use, creation and releases is a priority for Vari-Form, 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 or economically feasible reduction options for reducing PM_{2.5} were identified. The facility will continue to monitor new technological advancements to ensure that reduction options that are both technologically and financially viable are implemented at our facility.

1.4 Description of Substance

PM_{2.5} is not intentionally used or created by the Facility. PM_{2.5} is created as a by-product of integral Facility processes including the combustion of natural gas for comfort heating at the Facility and the welding operations that are required to create the end product.

1.5 Toxic Substance Reduction Option to be Implemented

There are currently no reduction options that have been identified as being 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 PM_{2.5}, prepared on behalf of Vari-Form, and dated December 10, 2013.

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 (PM ₁₀)	NA-09
Substances for which other plans have been prepared	Particulate Matter ≤2.5 Microns (PM _{2.5})	NA-10

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

Vari-Form is a leader in pressure-sequence hydroforming for high-performance structural parts. Headquartered in Troy, Michigan, with production facilities in Strathroy, Ontario, Reynosa, Mexico, Liberty, Missouri, Vari-Form originated the concept and application of hydroforming body, chassis and other structural parts. Vari-Form's technology is used to manufacture more than 7 million parts a year worldwide. The company began volume production using its patented, production-validated Pressure-Sequence Hydroforming (PSH) process in 1990. Vari-Form is the industry leader and has produced more than 100 million parts to date.

Wherever feasible, Vari-Form Inc. will reduce the creation and release of Particulate Matter ≤10 Microns (PM₁₀) in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Vari-Form and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

2.3 Reduction Objectives

The reduction of toxic substance use, creation and releases is a priority for Vari-Form, 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 or economically feasible reduction options for reducing PM₁₀ were identified. The facility 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

PM₁₀ is not intentionally used or created by the Facility. PM₁₀ is created as a by-product of integral Facility processes including the combustion of natural gas for comfort heating at the Facility and the welding operations that's are required to create the end product.

2.5 Toxic Substance Reduction Option to be Implemented

There are currently no reduction options that have been identified as being 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 PM₁₀, prepared on behalf of Vari-Form, and dated December 10, 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	Vari-Form Incorporated	
Facility Name	Plant B	
Facility Address	Physical Address:	Mailing Address
	250 Lothian Avenue Strathroy, Ontario N7G 4J7	250 Lothian Avenue Strathroy, Ontario N7G 4J7
Spatial Coordinates (UTM)	450493.79	4756343.25
Datum	WGS84	
Number of Employees	127	
NPRI ID	0000010759	
ON MOE ID	NA	
Parent Company Information		
Parent Company Name & Address	Not Applicable	
Percent Ownership		
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 Manufacturing	
4 Digit NAICS Code	3316 – Non-Ferrous (exc. Al) Production & Processing	
6 Digit NAICS Code	3316390 – Other Motor Vehicle Parts Manufacturing	
Company Contact Information		
Facility Public Contact	Jeff Grant EHS Coordinator	Contact Address
	JeffGrant@vari-form.com	780 Wright Street
	Phone: (519) 245-5200 Ext 2426	Strathroy, Ontario
	Fax: (519) 245-9920	N7G 4K5

4. COPY OF PLAN CERTIFICATION

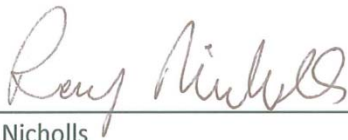
Certification by the Highest Ranking Employee

As of December 10, 2013, I, Randy Nicholls, 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:

Particulate Matter ≤ 2.5 microns ($PM_{2.5}$)

Particulate Matter ≤ 10 microns (PM_{10})



Randy Nicholls
Operations Director, Vari-Form Incorporated

Certification by Licensed Planner

As of December 10, 2013, I, Tim Logan certify that I am familiar with the processes at Vari-Form Incorporated's Plant B 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 December 10, 2013 and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Particulate Matter ≤ 2.5 microns ($PM_{2.5}$)

Particulate Matter ≤ 10 microns (PM_{10})



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