

VARI-FORM INCORPORATED

PLANT E

780 WRIGHT STREET, STRATHROY, ONTARIO N7G 4K5

TOXICS REDUCTION ACT

TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES

2017

REPORT PREPARED BY:
O2E INC.

REPORT PREPARED FOR:
VARI-FORM INCORPORATED

JANUARY 14, 2019

LONDON

•

ONTARIO

•

CANADA

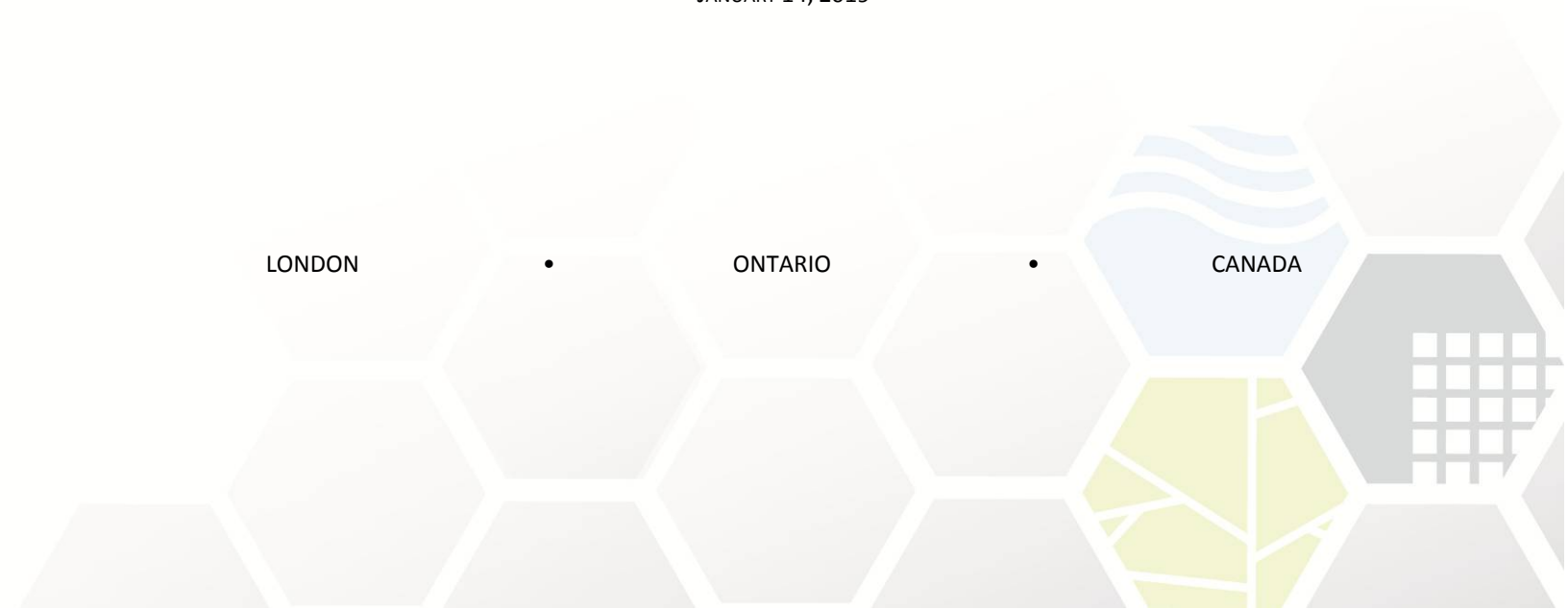


Table of Contents

1.	PLAN SUMMARY – PARTICULATE MATTER ≤ 2.5 MICRONS ($PM_{2.5}$).....	1
1.1	Basic Facility Information	1
1.2	Toxic Reduction Policy Statement.....	1
1.3	Reduction Objectives	1
1.4	Description of Substance	1
1.5	Toxic Substance Reduction Option to be Implemented	2
1.6	Plan Summary Statement.....	2
1.7	Copy of Plan Confirmation	2
2.	PLAN SUMMARY – PARTICULATE MATTER ≤ 10 MICRONS (PM_{10})	3
2.1	Basic Facility Information	3
2.2	Toxic Reduction Policy Statement.....	3
2.3	Reduction Objectives	3
2.4	Description of Substance	3
2.5	Toxic Substance Reduction Option to be Implemented	4
2.6	Plan Summary Statement.....	4
2.7	Copy of Plan Confirmation	4
3.	BASIC FACILITY INFORMATION	5
4.	COPY OF PLAN CONFIRMATION	6

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-M10
Substances for which other plans have been prepared	Particulate Matter ≤10 Microns (PM ₁₀) Manganese (and its compounds)	NA-M09 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 January 14, 2019.

1.7 Copy of Plan Confirmation

A copy of the plan confirmation 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-M09
Substances for which other plans have been prepared	Particulate Matter ≤2.5 Microns (PM _{2.5}) Manganese (and its compounds)	NA-M10 NA-09

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 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 January 14, 2019.

2.7 Copy of Plan Confirmation

A copy of the plan confirmation 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 E	
Facility Address	Physical Address:	Mailing Address
	780 Wright Street Strathroy, Ontario N7G 4K5	780 Wright Street Strathroy, Ontario N7G 4K5
Spatial Coordinates (UTM)	449139.44	4760004.18
Datum	WGS84	
Number of Employees	180	
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 Strathroy, Ontario N7G 4K5

4. COPY OF PLAN CONFIRMATION

Confirmation by the Highest Ranking Employee

As of January 14, 2019, I, Mike Hallam, 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, 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 ≤ 2.5 microns ($PM_{2.5}$)

Particulate Matter ≤ 10 microns (PM_{10})



Mike Hallam
Operations Director
Vari-Form Incorporated

Confirmation by Licensed Planner

As of January 14, 2019, I, Tim Logan certify that I am familiar with the processes at Vari-Form Incorporated's Plant E 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 January 14, 2019 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 ≤ 2.5 microns ($PM_{2.5}$)

Particulate Matter ≤ 10 microns (PM_{10})



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