

VARI-FORM INCORPORATED

PLANT E

250 LOTHIAN AVENUE, STRATHROY, ONTARIO, N7G 4J7

TOXICS REDUCTION ACT

TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES

2012

REPORT PREPARED BY:
O2E INC.

REPORT PREPARED FOR:
VARI-FORM INCORPORATED

DECEMBER 9, 2013

LONDON

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CANADA

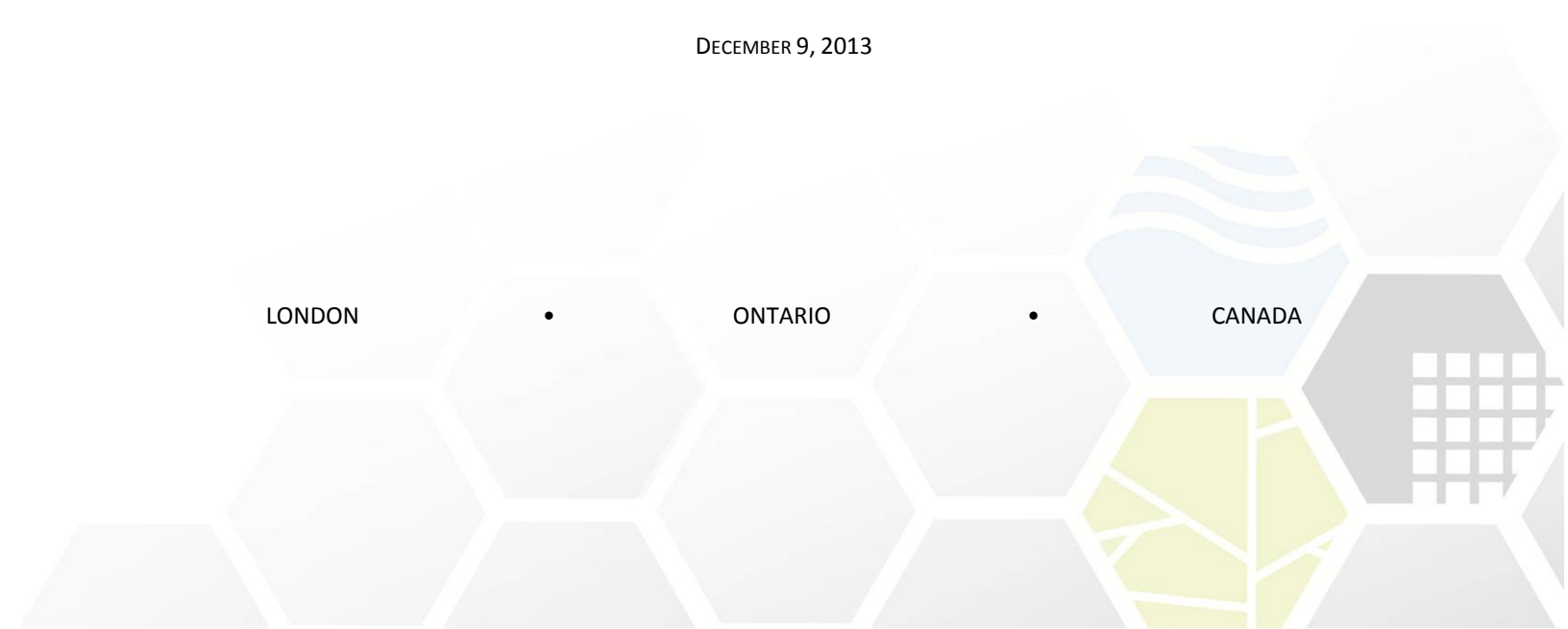


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1. PLAN SUMMARY PLANT E – MANGANESE (AND ITS COMPOUNDS)

Name and CASRN of Substance	Manganese (and its compounds)	7439-96-5
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1.1 Basic Facility Information

Basic facility information has been included in Section 2 of this document.

1.2 Toxic Reduction Policy Statement of Intent

Vari-Form is committed to comply with all applicable environmental legislation and other related requirements. Vari-Form is further committed to continuous reduction and prevention of pollution. Vari-Form's objectives and targets, focused on aspects and impacts appropriate to the industry, will be set and reviewed through existing sustainability programs. The objectives and targets will be accomplished through an effective environmental management system based on continuous improvement, team involvement, and employee development.

Wherever feasible, Vari-Form Inc. will reduce the use and release of Manganese (and its compounds) 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

All employees at Vari-Form Inc. will be involved in the reduction of toxic substance use, creation and releases. Their goal is to reduce the use and release of Manganese (and its compounds) where technically and economically feasible by the timetable noted in the plan. They will achieve these reductions through process modifications by the phasing out of their 415 and 473 programs which utilize resistance welding techniques by December 2015.

1.4 Description of Substance

Manganese (and its compounds) is a required alloy in steel used by the facility. Manganese (and its compounds) improves the machinability of steels and transverse ductility and toughness are improved when Manganese (and its compounds) is added in equal proportion to the steel's sulphur content. Manganese is also present in small quantities in the welding consumables used by the facility.

1.5 Toxic Substance Reduction Option to be Implemented

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

- Equipment or Process Modification – Process Modification – phasing out of resistance welding operations (415 and 473 programs) by 2015.

Manganese reductions due to implementing the options above are as follows:

Company Name: Vari-form Incorporated – Plant E

Substance: Manganese (and its compounds)

CASRN: Not Applicable

Reduction Option: Process Modification

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	364.884	0	346.535	0.005	0	0	0	0	17.167
Estimated reduced amount	31.091	0	28.97	0.005	0	0	0	0	2.808
Reduction	333.793	0	317.565	0	0	0	0	0	14.359
% Reduction	91%	NA	91%	0%	NA	NA	NA	NA	84%

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

1.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Manganese (and its compounds), prepared on behalf of Vari-Form, and dated December 9, 2013.

1.7 Copy of Plan Certification

A copy of the plan certification is presented in Section 3 of this document.

2. BASIC FACILITY INFORMATION

Facility Identification and Site Address		
Company Name	Vari-Form Incorporated	
Facility Name	Vari-Form Inc.	
Facility Address	Physical Address:	Mailing Address
	780 Wright Street Strathroy, Ontario N7G 4K5	780 Wright Street Strathroy, Ontario N7G 4K5
Spatial Coordinates (UTM)	449025.67	4759883.09
Datum	WGS84	
Number of Employees	180	
NPRI ID	0000010760	
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
	Phone: (519) 245-5200 Ext 2426	
	Fax: (519) 245-9920	

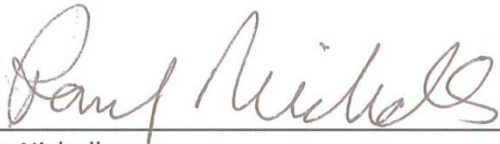
3. COPY OF PLAN CERTIFICATION

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:

Manganese (and its compounds)



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 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 December 9, 2013 and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Manganese (and its compounds)



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