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# Toxics Reduction Plan Summary

**Chromium (and its compounds)**  
**CAS # - NA - 04**

December 15, 2017

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**Prepared for:**  
Samuel Plate Sales  
(Samuel Son & Co. Limited)  
12 Teal Avenue  
Stoney Creek, Ontario  
L8E 3Y5

**Prepared by:**  
Airzone One Ltd.  
222 Matheson Blvd E  
Mississauga, ON  
L4Z 1X1

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## 1.0 Introduction

Samuel Son & Co. Limited – Stoney Creek (Samuel Plate Sales) (hereafter “Samuel”) produces cut-to-order steel plate from carbon plate and stainless steel. The stainless steel process was introduced at the Teal Avenue location in 2016. Chromium and Nickel are components of the stainless steel plate that enters Samuel Plate facility.

Stainless steel is received by truck, stored in inventory and cut to customer specifications by using either plasma or laser cutting processes. Air extraction and downdraft vents capture fumes that are directed to filter baghouses located in the plant (the collected dust is sent for recycling). The finished product is shipped by truck from the plant.

The facility is required to prepare plans under The Toxics Reduction Act (and O. Reg. 455/09); they have to account, report and prepare plans on the reduction of specific toxic substances. The facility is required to report three substances: manganese, chromium and nickel. Chromium and nickel are contained in the stainless steel and manganese is contained in the carbon steel plate.

As per the requirements of the regulation a plan for each substance reported was prepared. A plan for manganese and its compounds (CAS# - NA - 09) was prepared in December 2012 by Altech Environmental Consulting Ltd. For the 2016 reporting year, two new substances were reported (chromium CAS# - NA - 04 and nickel CAS# - NA - 11).

Chromium and Nickel are components of the stainless steel plate that enters the Samuel Plate facility. Stainless steel is cut at the facility to customer specification.

**Table 1-1 - General Facility Information**

<b>NPRI Number</b>	11782
<b>O Reg 127/01 Number</b>	N/A
<b>Number of full time employee equivalents</b>	106
<b>NAICS Code (2 digit)</b>	31-33 - Manufacturing
<b>NAICS Code (4 digit)</b>	3323 - Architectural & Structural Metal Manufacturing
<b>NAICS Code (6 digit)</b>	332319 - Other Plate Work & Fabricated Structural Product Manufacturing
<b>UTM Coordinates</b>	17 T 602996m E 4787848m N
<b>Company Legal Name</b>	Samuel Son & Co. Limited
<b>Company Trade Name</b>	Samuel Son & Co. Limited - Stoney Creek (Samuel Plate Sales)
<b>Parent Company</b>	Samuel Son & Co. Limited

**1.1. Plan Contacts**

A list of the individuals involved in the planning process is provided below:

<p><b>Public Contact</b></p> <p>Alf Keddy  Regional Operations Manager  12 Teal Avenue  Stoney Creek, Ontario  L8E 3Y5  Tel: (905) 573-9100 x 12109  Fax: (905)-561-2185  Email: <a href="mailto:akeddy@samuel.com">akeddy@samuel.com</a></p>
<p>TRA Licence #: TSRP0223</p>

## 2.0 Facility's Intent, Objectives and Targets

### 2.1. *Use*

The act requires that a facility include a statement of intent to reduce the use of the prescribed toxic substance. If the facility does not provide a statement of intent it must provide a reason why it does not intend or why it is not possible to reduce the use of the toxic substance. In addition to this, the facility is required to provide a list of objectives.

#### **Statement of intent:**

The facility does not have a statement of intent.

#### **Reason why the facility does not have a statement of intent:** (if applicable)

Samuel Plate Sales does not intend to reduce chromium because (i) it is an integral part of the stainless steel material and the products that are manufactured, (ii) there are no further reduction options possible, and, (iii) there is not a suitable substitute (economically or technically) that could provide a product that is within the customers' demands.

#### **Objectives:** (a list of objectives to reduce if any)

Samuel Plate Sales is committed to reviewing its environmental policies and will continuously improve the environmental programs in place at the facility. As chromium is a key component in the stainless steel brought into the facility, its elimination is not a viable option. The stainless steel process currently represents only 1% of all production at Samuel Plate Sales. Although Samuel Plate Sales does not intend to reduce the use of chromium at present, they will continue to assess new reduction options and new technology that could be implemented in the future in order to keep up with industry standards with regards to chromium pollution prevention.

**Quantity Target:** (if any)

No target

**Target Timeline:** (if any can be expressed in years or described in text box, or no timeline can be selected)

No timeline

**Reason why toxic substance is used at the facility:** (from drop down menu options)

For on-site use/ processing.

## **2.2. Creation**

The act requires that a facility include a statement of intent to reduce the creation of the prescribed toxic substance. If the facility does not provide a statement of intent it must provide a reason why it does not intend or why it is not possible to reduce the creation of the toxic substance.

### **Statement of intent:**

The facility does not have a statement of intent.

### **Reason why the facility does not have a statement of intent:**

The facility does not create the subject substances at the facility; therefore it is not required to provide a statement of intent on the creation of this substance.

**Objectives:** N/A

**Quantity Target:** N/A

**Target Timeline:** N/A

**Reason why toxic substance is used at the facility:** N/A.

### **3.0 Facility's Goals**

There are no reasonable reduction options for this substance and many of the reduction options possible have already been implemented in the past.

### **4.0 Facility TRA Plan (info)**

This plan summary is accurate, up-to-date and reflects the current facility version of the Toxic Reduction Plan.

### **5.0 Signed Certification Statements**

**Certification by highest ranking employee**

As of December 15<sup>th</sup>, 2017 [date], I, Alf Keddy, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

**Chromium and its Compounds (CAS# - NA-04)**

Signed:

A handwritten signature in cursive script, appearing to read 'Alf Keddy', is written over a horizontal line.

Alf Keddy

Regional Operations Manager

## Certification by toxic substance reduction planner

As of December 15<sup>th</sup>, 2017 [date], I, Franco DiGiovanni, certify that I am familiar with the processes at Samuel Son & Co. Limited (Samuel Plate Sales, Stoney Creek) that use or create the toxic substance 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 plan dated December 15<sup>th</sup>, 2017 [version date] and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

### Chromium and its Compounds (CAS# - NA-04)

Signed:



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Franco DiGiovanni

**Airzone One Ltd.**