

TS Tech Trimont Mfg. Inc. (Interior Plant)

Toxics Reduction Act 2019 Annual Report (Public)

Prepared For:

TS Tech Trimont Mfg. Inc. (Interior Plant) 115 Milner Avenue Scarborough, Ontario M1S 4L7

May 26, 2020

Prepared By:

RWDI AIR Inc. 600 Southgate Drive Guelph, Ontario N1G 4P6 (519) 823-1311 www.rwdi.com

Contents

1 Executive Summary	1
2 Introduction	2
3 Reduction Plan Objective(s) and Target(s)	2
4 General Information	3
5 2019 Toxic Substance Accounting	4
6 Annual Comparison	6
7 Changes in Tracking and Quantifications Methods in 2019	8
8 Significant Process Changes in 2019 Relative to Plan	8
9 Estimated Reductions Under Options Selected	8
10 Timelines for Achieving Estimated Reductions	8
11 Additional Actions	8
12 Plan Amendments	8
13 Appendix	9

1 Executive Summary

The TS Tech facility at Milner Avenue manufactures and assembles quality automotive interior components while complying with all applicable federal and provincial (Ontario) legislation.

This document is a public version of the 2019 TRA Annual Report that the facility has submitted to the Ontario Ministry of the Environment, Conservation and Parks (MECP) in July 2020 as required by O. Reg. 455/09 under the Ontario Toxics Reduction Act, 2009.

Four toxic substances, Chromium Compounds, Volatile Organic Compounds (VOCs), Methanol, and Methyl Ethyl Ketone were used and /or unintentionally created by processes at the Milner Avenue facility in 2019.

The facility has completed Toxic Substance Reduction Plans for Volatile Organic Compounds (VOCs), Methanol, and Methyl Ethyl Ketone and has submitted plan summaries to the MECP for each of these substances. Public versions of these plan summaries are also available online. The objectives of the above-mentioned plans were to meet compliance requirements with the Ontario Toxics Reduction Act and to provide the facility with a detailed overview of the processes, conditions and quantities in which Toxic Substances are used at the facility to better inform future efforts at reducing toxic substance use at the facility. As per the Plans for these substances this facility does not intend to reduce their use and /or creation since it is understood that they are legally not required to do so within the framework of the Toxics Reduction Act or its regulations.

On December 31, 2021 the Toxics Reduction Act will be repealed and its associated regulations revoked, ending the Toxics Reduction Program. Until this time, facilities must continue to meet the requirements of the Toxics Reduction Act and its associated regulations. As a result of regulatory changes, facilities no longer need to prepare new toxic substance reduction plans should they meet the reporting criteria. Therefore, a Toxic Substance Reduction Plan for Chromium Compounds was not prepared as this is the first year that Chromium Compounds have met the reporting criteria.

2 Introduction

The TS Tech facility at Milner Avenue manufactures and assembles quality automotive interior components while complying with all applicable federal and provincial (Ontario) legislation.

Four toxic substances, Chromium Compounds, Volatile Organic Compounds (VOCs), Methanol, and Methyl Ethyl Ketone were used and /or unintentionally created by processes at the Milner Avenue facility in 2019.

The facility has completed Toxic Substance Reduction Plans for Volatile Organic Compounds (VOCs), Methanol, and Methyl Ethyl Ketone and has submitted plan summaries to the MECP for each of these substances. Public versions of these plan summaries are also available online.

On December 31, 2021 the Toxics Reduction Act will be repealed and its associated regulations revoked, ending the Toxics Reduction Program. Until this time, facilities must continue to meet the requirements of the Toxics Reduction Act and its associated regulations. As a result of regulatory changes, facilities no longer need to prepare new toxic substance reduction plans should they meet the reporting criteria. Therefore, a Toxic Substance Reduction Plan for Chromium Compounds was not prepared as this is the first year that Chromium Compounds have met the reporting criteria.

This document is a public version of the 2019 TRA Annual Report that the facility has submitted to the MECP in July 2020 as required by O. Reg. 455/09 under the Ontario Toxics Reduction Act.

3 Reduction Plan Objective(s) and Target(s)

The facility has completed Toxic Substance Reduction Plans for Methanol, Methyl Ethyl Ketone, and Volatile Organic Compounds and summaries of these plans were submitted to the MECP on or before December 31st, 2018.

The objectives of the above-mentioned plans were to meet compliance requirements with the Ontario Toxics Reduction Act and to provide the facility with a detailed overview of the processes, conditions and quantities in which Toxic Substances are used at the facility to better inform future efforts at reducing toxic substance use at the facility.

As per the Plans for Methyl Ethyl Ketone, Methanol and Volatile Organic Compounds, this facility does not intend to reduce the use and /or creation of these substances since it is understood that they are legally not required to do so within the framework of the Toxics Reduction Act or its regulations.

4 General Information

Table 1 Facility Information

1 - Facility Information	
Facility Name	TS Tech Trimont Mfg. Inc. (Interior Plant)
NPRI ID:	11727
2-Digit NAICS Code	33
4-Digit NAICS Code	3363
6-Digit NAICS Code	336360
Number of Full-time Employees	219
UTM Co-ordinates (NAD83)	E641021 N4849475
2 - Facility Owner Information	
Name	TS Tech Trimont Mfg. Inc.
Address	115 Milner Avenue, Scarborough, ON, M1S4L7
Phone Number	416-640-2045
Fax	416-847-3935
E-mail	steven_li@tstna.com; flora_ganuelas@tstna.com
3 - Facility Operator Information (if applicable)	
Name	
Address	
Phone Number	
Fax	
E-mail	
5 - Toxic Substances for Which Facility Must Prepa	re Plan by December 31 st 2020

- 6 Toxic Substances for Which Facility has Prepared Plans and Submitted Plan Summaries
 1. Volatile Organic Compounds (NPRI CAS NA-M16) December 2013
 - 2. Methyl Ethyl Ketone (CAS 78-93-3) December 2013
 - 3. Methanol (CAS 67-56-1) December 2014

7 –Report Contacts			
Name of Public Contact	Flora Ganuelas		
Position	Assist. Mgr. Personnel & Admin.		
Address	115 Milner Avenue, Scarborough, ON, M1S4L7		
Phone Number	416-640-2045		
Fax	416-847-3935		
E-mail	flora_ganuelas@tstna.com		

5 2019 Toxic Substance Accounting

Table 2 - 2019 Production Year Toxic Substance Accounting

Chemical	Chemical CAS Transfe		2019 Range (T)
Methanol	67-56-1	Entered Facility (T)	1 - 10
	67-56-1	Contained in Product (T)	0
	67-56-1	Created (T)	0
	67-56-1	Destroyed (T)	0
	67-56-1	Transformed (T)	0
	67-56-1	Released to Air (T)	1 - 10
	67-56-1	Disposed (T)	0
	67-56-1	Recycled (T)	0
Methyl Ethyl Ketone	78-93-3	Entered Facility (T)	1 - 10
	78-93-3	Contained in Product (T)	0
	78-93-3	Created (T)	0
	78-93-3	Destroyed (T)	0
	78-93-3	Transformed (T)	0
	78-93-3	Released to Air (T)	1 - 10
	78-93-3	Disposed (T)	0
	78-93-3	Recycled (T)	0
Volatile Organic Compounds	NA-M16	Entered Facility (T)	10 - 100
	NA-M16	Contained in Product (T)	0
	NA-M16	Created (T)	0 - 1
	NA-M16	Destroyed (T)	0
	NA-M16	Transformed (T)	0
	NA-M16	Released to Air (T)	10 - 100
	NA-M16	Disposed (T)	0
	NA-M16	Recycled (T)	0
Chromium Compounds	NA-04	Entered Facility (T)	10 - 100

Chemical	CAS	Transfer Description	2019 Range (T)
		Contained in Product (T)	10 - 100
		Created (T)	0
		Destroyed (T)	0
		Transformed (T)	0
		Released to Air (T)	0 - 1
		Disposed (T)	0
		Recycled (T)	0

6 Annual Comparison

Table 3 Comparison of 2018 Production vs. 2019 Production Toxic Substance Accounting

Chemical	CAS	Transfer Description	2018 Range (T)	2019 Range (T)	Change (T)	Change (%)	Reasons for Change
Methanol	67-56-1	Entered Facility (T)	1 - 10	1 - 10	-0.3231	-20.23	Year to year variability in production influences usage quantities of products containing substance.
		Contained in Product (T)	0	0	0.0000	0.00	
		Created (T)	0	0	0.0000	0.00	
		Destroyed (T)	0	0	0.0000	0.00	
		Transformed (T)	0	0	0.0000	0.00	
		Released to Air (T)	1 - 10	1 - 10	-0.3231	-20.23	Year to year variability in production influences emission rates.
		Disposed (T)	0	0	0.0000	0.00	
		Recycled (T)	0	0	0.0000	0.00	
Methyl Ethyl Ketone	78-93-3	Entered Facility (T)	1 - 10	1 - 10	0.1173	1.86	Year to year variability in production influences usage quantities of products containing substance.
		Contained in Product (T)	0	0	0.0000	0.00	
		Created (T)	0	0	0.0000	0.00	
		Destroyed (T)	0	0	0.0000	0.00	
		Transformed (T)	0	0	0.0000	0.00	
		Released to Air (T)	1 - 10	1 - 10	0.1173	1.86	Year to year variability in production influences emission rates.
		Disposed (T)	0	0	0.0000	0.00	
		Recycled (T)	0	0	0.0000	0.00	
Volatile Organic Compounds	NA-M16	Entered Facility (T)	10 - 100	10 - 100	-0.1673	-0.61	Year to year variability in production influences usage quantities of products containing substance.

Chemical	CAS	Transfer Description	2018 Range (T)	2019 Range (T)	Change (T)	Change (%)	Reasons for Change
		Contained in Product (T)	0	0	0.0000	0.00	
		Created (T)	0 - 1	0 - 1	-0.0028	-3.60	Year to year variability in natural gas consumption and variability in production processes involving plastic moulding.
		Destroyed (T)	0	0	0.0000	0.00	
		Transformed (T)	0	0	0.0000	0.00	
		Released to Air (T)	10 - 100	10 - 100	-0.1701	-0.62	Year to year variability in production and natural gas consumption have an influence on emission rates.
		Disposed (T)	0	0	0.0000	0.00	
		Recycled (T)	0	0	0.0000	0.00	
Chromium Compounds	N/A-04	Entered Facility (T)	N/A		N/A	N/A	2019 is the first year for reporting Chromium Compounds
		Contained in Product (T)	N/A		N/A	N/A	
		Created (T)	N/A		N/A	N/A	
		Destroyed (T)	N/A		N/A	N/A	
		Transformed (T)	N/A		N/A	N/A	
		Released to Air (T)	N/A		N/A	N/A	
		Disposed (T)	N/A		N/A	N/A	
		Recycled (T)	N/A		N/A	N/A	

7 Changes in Tracking and Quantifications Methods in 2019

No changes.

8 Significant Process Changes in 2019 Relative to Plan

No changes.

9 Estimated Reductions Under Options Selected

As per the Plans for Methyl Ethyl Ketone, Methanol and Volatile Organic Compounds, this facility does not intend to reduce the use and /or creation of these substances since it is understood that they are legally not required to do so within the framework of the Toxics Reduction Act or its regulations.

10 Timelines for Achieving Estimated Reductions

No timelines have been set since the facility is not planning to implement any reduction options within the TRA framework.

11 Additional Actions

No additional actions were undertaken in 2019.

12 Plan Amendments

No amendments were made to the plan in 2019.

TS Tech Trimont Mfg. Inc. (Interior Plant)
2019 TRA Annual Report - Public

13 Appendix

2019 SWIM Inventory Report Certification Page:

Report Submission and Electronic Certification

Specify the language of correspondence	
English	
Comments (optional)	

I hereby certify that I have exercised due diligence to ensure that the submitted information is true and complete. The amounts and values for the facility(ies) identified below are accurate, based on reasonable estimates using available data. The data for the facility(ies) that I represent are hereby submitted to the programs identified below using the Single Window Reporting Application.

I also acknowledge that the data will be made public.

Note: Only the person identified as the Certifying Official or the authorized delegate should submit the report(s) identified below.

Company Name

TS Tech Trimont Mfg. Inc.

Certifying Official (or authorized delegate)

Steven Li

Report Submitted by

Flora Ganuelas

I, the Certifying Official or authorized delegate, agree with the statements above and acknowledge that by pressing the "Submit Report(s)" button, I am electronically certifying and submitting the facility report(s) for the identified company to its affiliated programs.

ON MECP TRA - Electronic Certification Statement

Annual Report Certification Statement

As of 2020-06-15, I, Steven Li, certify that I have read the reports on the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the information contained in the reports is factually accurate and the reports comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

TRA Substance List*

CAS RN	Substance Name
67-56-1	Methanol

78-93-3	Methyl ethyl ketone
Company Name	
TS Tech Trimont Mfg. Inc.	
Highest Ranking Employee	
Steven Li	
Report Submitted by	
Flora Ganuelas	

Website address

https://onedrive.live.com/?authkey=%21ANIaCzPWkmPus40&id=90A279D5C1ED4772%21149&cid=90A279D5C1ED4772

I, the highest ranking employee, agree with the certification statement(s) above and acknowledge that by checking the box I am electronically signing the statement(s). I also acknowledge that by pressing the 'Submit Report(s)' button I am submitting the facility record(s)/report(s) for the identified facility to the Director under the Toxics Reduction Act, 2009. I also acknowledge that the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 provide the authority to the Director under the Act to make certain information as specified in subsection 27(5) of Ontario Regulation 455/09 available to the public.

Submitted Report

Period	Submission Date	Facility Name	Province	City	Programs
2019	2020-06-15	Interior Plant	Ontario	Toronto	NPRI,ON MECP TRA

Note: If there is a change in the contact information for the facility, a change in the owner or operator of the facility, if operations at the facility are terminated, or if information submitted for any previous year was mistaken or inaccurate, please update this information through SWIM or by contacting the National Pollutant Release Inventory directly.