

2016



TS Tech Trimont Mfg. Inc. (Interior Plant)

2016 Toxics Reduction Plan Summary (Public Report) for:

Ethyl Acetate (CAS: 141-78-6)

Propane (CAS: 74-98-6)

Prepared For:

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

December 5th 2017

Prepared By:

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1 Executive Summary

This plan summary document is a public version of the Plan Summary document that TS Tech submitted to the Ministry of the Environment and Climate Change (MOECC) via Environment Canada's SWIM website. It accurately reflects the contents of the toxic substance reduction plan for Ethyl Acetate ("EA") and Propane ("PROP") dated November 30th 2017, which was prepared by TS Tech Trimont Mfg. Inc. (Interior plant).

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

The main activities that take place at the facility are:

- 1) Plastic resin processing into interior panels at the facility's injection molding machines. Both EA and PROP are not associated with this activity.
- 2) Interior panel paint touch-up and repair at paint touch-up and repair stations located at the injection molding machine areas and at the Front and Rear Door Assembly lines (Jig Con Lines). Each of the repair stations use touch-up paint (containing EA and PROP) and mark remover (containing PROP).
- 3) Interior panel component assembly at the facility's Civic and CRV Centre lines (Formerly Kimekomi and Centre lines) and the Front and Rear Door Assembly lines (Jig Con Lines). Both EA and PROP are not associated with this activity.
- 4) Finished goods warehousing/shipping. Both EA and PROP are not associated with this activity.

Additionally there are heating equipment at the facility that combust natural gas to provide comfort heat which results in the incidental creation of PROP.

At present the facility does not intend to reduce the use of EA and PROP since it is understood that they are not legally required to do so. For this reason no toxic reduction options have been selected for implementation. However the facility is willing to change this position in the near future and is open to investigating and evaluating the suitability of equipment, technologies and processes methodologies which could potentially reduce the use of Toxic Substances at the facility.

Additionally, the facility will not address the reduction of PROP since it is incidentally created in very small quantities and because it understood that the facility is not legally required to do so.

2 Basic Facility Information

Table 1 Facility Information

1 - Facility Information	
Facility Name	TS Tech Trimont Mfg. Inc. (Interior Plant)
NPRI ID:	0000011727
2-Digit NAICS Code	33
4-Digit NAICS Code	3363
6-Digit NAICS Code	336360
Number of Full-time Employees	276
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	
4 – Facility Public Contact Information	
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 - Parent Company Information	
Legal Name of Parent Company	TS Tech Americas Inc.
Address of Parent Company	8458 E Broad St, Reynoldsburg, OH 43068, USA
Percentage of Facility Ownership	100%
CCRA Business Number	896361946
6 - Toxic Substances for Which Facility has Prepared Plans and Submitted Plan Summaries	
Volatile Organic Compounds (NPRI ID: NA-M16)	
Methyl Ethyl Ketone (CAS 78-93-3)	
Methanol (CAS 67-56-1)	
7 - Toxic Substances for Which Facility Must Prepare Plan on or by December 31st 2017	
Ethyl Acetate (CAS 141-78-6) and Propane (CAS 74-98-6)	

3 Toxic Substance and Use

5 TRA designated substances, Ethyl Acetate (“EA”), Propane (“PROP”), Methanol, Methyl Ethyl Ketone (MEK) and Volatile Organic Compounds (VOC), were used in processes at this facility in 2016. Additionally, EA, PROP, Methanol and VOCs are incidentally created at the facility and released to air due to natural gas combustion to provide comfort heating.

Toxic substance reduction plans for Methanol, VOCs and MEK were prepared in previous years (prior to 2016) due to meeting TRA reporting criteria. Since Methanol, MEK and VOCs already have plans in place, these chemicals will not be considered in this document going forward.

This plan summary document is a public version of the Plan Summary document that TS Tech submitted to the Ministry of the Environment and Climate Change (MOECC) via Environment Canada’s SWIM website. It accurately reflects the contents of the toxic substance reduction plan for EA and PROP prepared by TS Tech Trimont Mfg. Inc. (Interior plant) dated November 30th 2017.

PROP is contained in the following products used at the facility:

- 1) The touchup-paint and mark remover products that are applied onto some of the interior panels at each of the facility’s paint touch-up and repair stations (located at the injection molding area and Front and Rear Door Assembly lines (Jig Con Lines).

Additionally small amounts of PROP is incidentally created (and released to air) at the facility from the combustion of natural gas (comfort heating).

EA is contained in the following products used at the facility:

- 1) The touchup-paint applied onto some of the interior panels at each of the facility’s paint touch-up and repair stations (located at the injection molding area and Front and Rear Door Assembly lines (Jig Con Lines).

It should be noted that there is no creation of this chemical at the facility.

4 Plan Summary Intent

This plan summary accurately reflects the contents of the toxic substance reduction plan for EA and PROP prepared by TS Tech Trimont Mfg. Inc. (Interior plant) dated November 30th 2017.

5 Statement of Intent and Reduction Objectives

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

The main activities that take place at the facility are:

- 5) Plastic resin processing into interior panels at the facility's injection molding machines. Both EA and PROP are not associated with this activity.
- 6) Interior panel paint touch-up and repair at paint touch –up and repair stations located at the injection molding machine areas and at the Front and Rear Door Assembly lines (Jig Con Lines). Each of the repair stations use touch-up paint and mark remover that contain EA and or PROP.
- 7) Interior panel component assembly at the facility's Civic and CRV Centre lines (Formerly Kimekomi and Centre lines) and the Front and Rear Door Assembly lines (Jig Con Lines). Both EA and PROP are not associated with this activity.
- 8) Finished goods warehousing/shipping. Both EA and PROP are not associated with this activity.

Additionally there are heating equipment at the facility that combusts natural gas to provide comfort heat which results in the incidental creation of PROP.

At present the facility does not intend to reduce the use of EA and PROP since it is understood that they are not legally required to do so. For this reason no toxic reduction options have been selected for implementation. However the facility is willing to change this position in the near future and is open to investigating and evaluating the suitability of equipment, technologies and processes methodologies which could potentially reduce the use of Toxic Substances at the facility.

Additionally, the facility will not address the reduction of PROP since it is incidentally created in very small quantities and because it understood that the facility is not legally required to do so.

6 Description of Reduction Options to be Implemented

At present the facility does not intend to reduce the use and/or creation of these chemicals since it is understood that they are not legally required to do so. For this reason no toxic reduction options have been selected for implementation. However the facility is willing to change this position in the near future and is open to investigating and evaluating the suitability of equipment, technologies and processes methodologies which could potentially reduce the use of Toxic Substances at the facility.

7 Estimated Reductions Under Options Selected

No reductions have been estimated since the facility is not planning to reduce the use and or creation of EA and PROP at present.

8 Timelines for Achieving Estimated Reductions

No timelines have been set since the facility is not planning to reduce the use and or creation of EA and PROP at present.

9 Copy of Certification Statement for EA and PROP

*TS Tech Trimont Mfg. Inc.
TSRP for EA and PROP*

7 Certification for EA and PROP

Certification by Highest Ranking Employee (HRE)

As of December 8th 2017, I, Steven Li 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.

Ethyl Acetate ("EA", CAS: 141-78-6)
Propane ("PROP", CAS: 74-98-6)



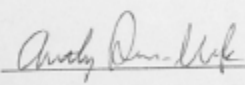
Steven Li
President

TS Tech Trimont Mfg. Inc. (Interior Plant)

Certification by Licensed Planner

As of December 2nd 2017, I, Anthony Desilva-Wijeyeratne certify that I am familiar with the processes at TS Tech Trimont Mfg. Inc. (Interior Plant) 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 toxic substance reduction plans referred to below for the toxic substances and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Ethyl Acetate ("EA", CAS: 141-78-6), November 30th 2017
Propane ("PROP", CAS: 74-98-6), November 30th 2017



Anthony Desilva-Wijeyeratne
(Planner License #TSRP0141)
*Lead Consulting Analyst and Licensed Toxic Substance
Reduction Planner*
Envirotech Associates Ltd.

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