



Toxic Reduction Act
Public Annual Report
2011

INTRODUCTION

ACL Steel Ltd. is a privately owned company with over 30 years experience in design, manufacture and erection of steel products for the construction industry, requiring occasional welding and primer painting. We offer a full range of services including fast track, design-build, fabrication and erection of structural steel, miscellaneous metals, steel deck and siding. Our facility, constructed in 2005, is located in the Grand River West Business Park in Kitchener, Ontario.

You will find our steel anywhere from the Havana Airport in Cuba to the De Beers Diamond mine in James Bay. Our steel is in the school you attend, the grocery or big-box store you shop at or perhaps at work in your office-tower or plant facility.

We are continuously upgrading our facility, training our staff and reviewing internal processes so that our service and product quality is rated superior in the marketplace.

Our mission

- to provide excellence in quality products and services
- to provide our employees with a work environment which is safe and secure, and consistent with being both challenging and rewarding
- to fulfill our corporate responsibilities to the community and the environment

TOXIC SUBSTANCES

Toxic substance reduction plans have been prepared for the following substances:

- Xylene (all isomers) - CAS No. 1330-20-7;
- 1,2,4-Trimethylbenzene – CAS No. 95-63-6;
- Heavy aromatic solvent naphtha – CAS No. 64742-94-5;
- Light aromatic solvent naphtha – CAS No. 64742-95-6;
- Solvent naphtha light aliphatic – CAS No. 64742-89-8; and
- Stoddard solvent – CAS No. 8052-41-3.

GENERAL FACILITY INFORMATION

Facility Information	
Facility Name	ACL Steel Ltd.
Facility Address	2255 Shirley Drive Kitchener, Ontario N2B 3X4
UTM Coordinates and Datum (NAD83)	Easting: 545828 m, Northing: 4813277 m (Zone 17, NAD 83 Datum)
NPRI ID:	11267
Number of Employees	46
Facility Contact Information	
Facility Public Contact	Paul Seibel, President 519-568-8822, ext. 222
North American Industrial Classification System Code (NAICS)	
2 Digit NAICS code	33 – Manufacturing
4 Digit NAICS code	3329 – Other fabricated metal manufacturing
6 Digit NAICS code	332999 – All Other Miscellaneous Fabricated Metal Product Manufacturing

Plan Summaries

Substance: Xylene (all isomers)
CAS #: 1330-20-7
<i>Statement of Intent</i>
ACL Steel is committed to fulfilling our responsibilities to the community and the environment regarding toxic substance reduction. ACL Steel does not intend to reduce the use of Xylene because suitable alternatives to the products used which contain Xylene do not currently exist. ACL Steel will continue to monitor new technologies and products, which will be implemented when technically and economically feasible.
<i>Plan Objectives</i>
To reduce emissions of Xylene by finding suitable alternative products and/or technologies to reduce Xylene use over the next few years.
<i>Description of Substance</i>
Xylene arrives in paints, primers and thinners used at the facility. Xylene is used as a thinning aid, as a cleaner and is present in paints and primer used to coat manufactured mild steel parts. No Xylene is created at the facility.
<i>Toxic Substance Reduction Option(s) to be Implemented</i>
ACL Steel has implemented training programs and operating practices that follow best industry practices including preventive maintenance practices, inventory management, and the use of high efficiency nozzles paint spray guns to reduce paint and primer volumes and accordingly, Xylene emissions. Standard Operating Procedures (SOPs) will be reviewed yearly and improved where possible to assist with reducing Xylene use. Suitable alternative products, such as water based paints, primers and thinners, and/or technologies such as equipment to use water based products to reduce Xylene use will also be monitored and implemented when possible.

This plan summary accurately reflects the 2011 Ontario Toxic Substance Reduction Planning report prepared by MTE Consultants and ACL Steel Ltd. for Xylene dated December 21, 2012.

Substance: 1,2,4-Trimethylbenzene

CAS #: 95-63-6

Statement of Intent

ACL Steel is committed to fulfilling our responsibilities to the community and the environment regarding toxic substance reduction. ACL Steel does not intend to reduce the use of 1,2,4-Trimethylbenzene because suitable alternatives to the products which contain 1,2,4-Trimethylbenzene do not currently exist. ACL Steel will continue to monitor new technologies and products, which will be implemented when technically and economically feasible.

Plan Objectives

To reduce emissions of 1,2,4-Trimethylbenzene by finding suitable alternative products and/or technologies to reduce 1,2,4-Trimethylbenzene use over the next few years.

Description of Substance

1,2,4-Trimethylbenzene arrives in paints and primers used at the facility. 1,2,4-Trimethylbenzene is present in paints and primer used to coat manufactured mild steel parts. No 1,2,4-Trimethylbenzene is created at the facility.

Toxic Substance Reduction Option(s) to be Implemented

ACL Steel has implemented training programs and operating practices that follow best industry practices including preventive maintenance practices, inventory management, and the use of high efficiency nozzles paint spray guns to reduce paint and primer volumes and accordingly, 1,2,4-Trimethylbenzene emissions. Standard Operating Procedures (SOPs) will be reviewed yearly and improved where possible to assist with reducing 1,2,4-Trimethylbenzene use. Suitable alternative products, such as water based paints and primers, and/or technologies such as equipment to use water based products to reduce 1,2,4-Trimethylbenzene use will also be monitored and implemented when possible.

This plan summary accurately reflects the 2011 Ontario Toxic Substance Reduction Planning report prepared by MTE Consultants and ACL Steel Ltd. for 1,2,4-Trimethylbenzene dated December 21, 2012 (updated July 31, 2014).

Substance: Heavy aromatic solvent naphtha

CAS #: 64742-94-5

Statement of Intent

ACL Steel is committed to fulfilling our responsibilities to the community and the environment regarding toxic substance reduction. ACL Steel does not intend to reduce the use of Heavy aromatic solvent naphtha because suitable alternatives to the products used which contain Heavy aromatic solvent naphtha do not currently exist. ACL Steel will continue to monitor new technologies and products, which will be implemented when technically and economically feasible.

Plan Objectives

To reduce emissions of Heavy aromatic solvent naphtha by finding suitable alternative products and/or technologies to reduce Heavy aromatic solvent naphtha use over the next few years.

Description of Substance

Heavy aromatic solvent naphtha arrives in paints and primers used at the facility. Heavy aromatic solvent naphtha is present in paints and primer used to coat manufactured mild steel parts. No Heavy aromatic solvent naphtha is created at the facility.

Toxic Substance Reduction Option(s) to be Implemented

ACL Steel has implemented training programs and operating practices that follow best industry practices including preventive maintenance practices, inventory management, and the use of high efficiency nozzles paint spray guns to reduce paint and primer volumes and accordingly, Heavy aromatic solvent naphtha emissions. Standard Operating Procedures (SOPs) will be reviewed yearly and improved where possible to assist with reducing Heavy aromatic solvent naphtha use. Suitable alternative products, such as water based paints and primers, and/or technologies such as equipment to use water based products to reduce Heavy aromatic solvent naphtha use will also be monitored and implemented when possible.

This plan summary accurately reflects the 2011 Ontario Toxic Substance Reduction Planning report prepared by MTE Consultants and ACL Steel Ltd. for Heavy aromatic solvent naphtha dated December 21, 2012 (updated July 31, 2014).

Substance: Light aromatic solvent naphtha

CAS #: 64742-95-6

Statement of Intent

ACL Steel is committed to fulfilling our responsibilities to the community and the environment regarding toxic substance reduction. ACL Steel does not intend to reduce the use of Light aromatic solvent naphtha because suitable alternatives to the products used which contain Light aromatic solvent naphtha do not currently exist. ACL Steel will continue to monitor new technologies and products, which will be implemented when technically and economically feasible.

Plan Objectives

To reduce emissions of Light aromatic solvent naphtha by finding suitable alternative products and/or technologies to reduce Light aromatic solvent naphtha use over the next few years.

Description of Substance

Light aromatic solvent naphtha arrives in paints and primers used at the facility. Light aromatic solvent naphtha is present in paints and primer used to coat manufactured mild steel parts. No Light aromatic solvent naphtha is created at the facility.

Toxic Substance Reduction Option(s) to be Implemented

ACL Steel has implemented training programs and operating practices that follow best industry practices including preventive maintenance practices, inventory management, and the use of high efficiency nozzles paint spray guns to reduce paint and primer volumes and accordingly, Light aromatic solvent naphtha emissions. Standard Operating Procedures (SOPs) will be reviewed yearly and improved where possible to assist with reducing Light aromatic solvent naphtha use. Suitable alternative products, such as water based paints and primers, and/or technologies such as equipment to use water based products to reduce Light aromatic solvent naphtha use will also be monitored and implemented when possible.

This plan summary accurately reflects the 2011 Ontario Toxic Substance Reduction Planning report prepared by MTE Consultants and ACL Steel Ltd. for Light aromatic solvent naphtha dated December 21, 2012 (updated July 31, 2014).

Substance: Solvent naphtha light aliphatic

CAS #: 64742-89-8

Statement of Intent

ACL Steel is committed to fulfilling our responsibilities to the community and the environment regarding toxic substance reduction. ACL Steel does not intend to reduce the use of Solvent naphtha light aliphatic because suitable alternatives to the products used which contain Solvent naphtha light aliphatic do not currently exist. ACL Steel will continue to monitor new technologies and products, which will be implemented when technically and economically feasible.

Plan Objectives

To reduce emissions of Solvent naphtha light aliphatic by finding suitable alternative products and/or technologies to reduce Solvent naphtha light aliphatic use over the next few years.

Description of Substance

Solvent naphtha light aliphatic arrives in paints and primers used at the facility. Solvent naphtha light aliphatic is present in paints and primer used to coat manufactured mild steel parts. No Solvent naphtha light aliphatic is created at the facility.

Toxic Substance Reduction Option(s) to be Implemented

ACL Steel has implemented training programs and operating practices that follow best industry practices including preventive maintenance practices, inventory management, and the use of high efficiency nozzles paint spray guns to reduce paint and primer volumes and accordingly, Solvent naphtha light aliphatic emissions. Standard Operating Procedures (SOPs) will be reviewed yearly and improved where possible to assist with reducing Solvent naphtha light aliphatic use. Suitable alternative products, such as water based paints and primers, and/or technologies such as equipment to use water based products to reduce Solvent naphtha light aliphatic use will also be monitored and implemented when possible.

This plan summary accurately reflects the 2011 Ontario Toxic Substance Reduction Planning report prepared by MTE Consultants and ACL Steel Ltd. for Solvent naphtha light aliphatic dated December 21, 2012 (updated July 31, 2014).

Substance: Stoddard solvent

CAS #: 8052-41-3

Statement of Intent

ACL Steel is committed to fulfilling our responsibilities to the community and the environment regarding toxic substance reduction. ACL Steel does not intend to reduce the use of Stoddard solvent because suitable alternatives to the products used which contain Solvent naphtha light aliphatic do not currently exist. ACL Steel will continue to monitor new technologies and products, which will be implemented when technically and economically feasible.

Plan Objectives

To reduce emissions of Stoddard solvent by finding suitable alternative products and/or technologies to reduce Stoddard solvent use over the next few years.

Description of Substance

Stoddard solvent arrives in paints and primers used at the facility. Stoddard solvent is present in paints and primer used to coat manufactured mild steel parts. No Stoddard solvent is created at the facility.

Toxic Substance Reduction Option(s) to be Implemented

ACL Steel has implemented training programs and operating practices that follow best industry practices including preventive maintenance practices, inventory management, and the use of high efficiency nozzles paint spray guns to reduce paint and primer volumes and accordingly, Stoddard solvent emissions. Standard Operating Procedures (SOPs) will be reviewed yearly and improved where possible to assist with reducing Stoddard solvent use. Suitable alternative products, such as water based paints and primers, and/or technologies such as equipment to use water based products to reduce Stoddard solvent use will also be monitored and implemented when possible.

This plan summary accurately reflects the 2011 Ontario Toxic Substance Reduction Planning report prepared by MTE Consultants and ACL Steel Ltd. for Light aromatic solvent naphtha dated December 21, 2012 (updated July 31, 2014).

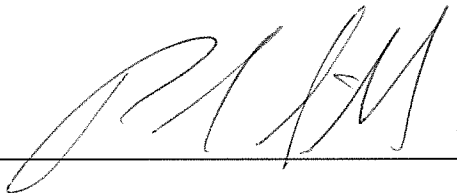
Attachment 1: Certification Statements

Certification by the Highest Ranking Employee

As of December 20, 2012, I, Paul Seibel, certify that I am familiar with the processes at ACL Steel Ltd. 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 dated December 21, 2012 (updated July 31, 2014) and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

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Paul Seibel
President
ACL Steel Ltd.

Certification by Licensed Planner

As of December 20, 2012, I, Ruth Westerveld, certify that I am familiar with the processes at ACL Steel Ltd. 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 dated December 21, 2012 (updated July 31, 2014) and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

- Xylene (all isomers) - CAS No. 1330-20-7;
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Ruth Westerveld
Project Manager/Toxic Substance Reduction Planner
MTE Consultants Inc.
License # TSRP0121