

Appendix B TRA Plan Summary – PM2.5

Basic Facility Information

Name & CAS # of Substance	Particulate Matter ≤ 2.5µm	NA
Substances for which other Plans have been prepared	Lead	7439-92-1
	PM10	NA
Facility Identification and Site Address		
Company Name	Martinrea International Inc.	
Facility Name	Martinrea Fabco	
Facility Address	Physical Address:	Mailing Address: (if different)
	99 Golf Course Line Ridgetown, Ontario N0P 2C0	
Spatial Coordination of Facility	4697616 N 427573 E; Zone 17	
Number of Employees	260	
NPRI ID	4891	
Ontario MOE ID Number	N/A	
Parent Company (PC) Information		
PC Name & Address	Martinrea International Inc. 30 Aviva Park Drive Vaughan, ON L4L 9C7	
Percent Ownership for each PC	100%	
Business Number for PC		
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	33 Manufacturing	
4 Digit NAICS Code	3363-Motor Vehicle Parts Manufacturing	
6 Digit NAICS Code	336370 – Motor Vehicle Metal Stamping	

Company Contact Information		
Facility Public Contact	Paul Escott Tooling Engineer	Same address as facility
	paul.escott@martinrea.com	
	Phone: 519- 674-0711 X258	
	Fax: 519- 674-0500	
Facility Technical Contact	Ian Wood Industrial Engineering	Same as facility address
	ian.wood@martinrea.com	
	Phone: 519 674- 0711	
	Fax: 519 -674 -0500	
Company Coordinator Contact	Same as Facility Technical Contact	
Person who Prepared the Plan: (if different from the Coordinator)	Erik Martinez, P.Eng.	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
	Environmental Consultant	
	Planner License No. TSRP0005	
	Erik.Martinez@GHD.com	
	Phone: 519- 884-0510 ext. 2342	
Highest Ranking Employee	Paul Escott Tooling Engineer	Same as facility address
	paul.escott@martinrea.com	
	Phone: 519- 674-0711 X258	
	Fax: 519- 674-0500	
Planner Information:		
Planner Responsible for Making Recommendations	Erik Martinez, P.Eng.	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
	Environmental Consultant	
	Planner License No. TSRP0005	
	Erik.Martinez@GHD.com	
	Phone: 519- 884-0510 ext. 2342	
Planner Responsible for Certification	(same as planner responsible for making recommendations)	

Toxic Reduction Policy Statement of Intent

Martinrea Fabco (Facility) does not use PM2.5. Martinrea Fabco is currently producing PM2.5 as part of the Welding Process, Cooling Tower Process and Natural Gas and propane Combustion Process. The Facility does not currently intend to reduce the creation of this toxic substance at the Facility.

Reduction Objectives

Martinrea Fabco prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. Martinrea Fabco's manufacturing operation has already been optimized to minimize the use of raw materials. In the future, Martinrea Fabco will strive to reduce the creation of PM2.5 at the Facility, should an option become available.

Description of Facility

Martinrea International Inc. is a leader in the global automotive sector. Martinrea Fabco, the Facility, is located in Ridgeway, Ontario and manufactures automotive parts and related components.

All steel coils and sheets received at the facility go directly to Stamping. From Stamping approximately 30% is shipped directly off-Site while 60% is Spot Welded and 10% is MIG Welded before being shipped off-Site. Aluminized and aluminum materials, nuts, bolts, and studs retain article status and do not release reportable substances when processed or used.

Toxic Substance Reduction Options

After looking into the seven categories of toxic substance reduction options, no options were identified. Explanations are provided in the table below to detail why an option could not be identified in each category.

Toxic Substance Reduction Category	Option: Identification and Description
1) Materials or feedstock substitution	No option identified: Martinrea Fabco's clients are major automotive companies. The raw materials to be used by Martinrea Fabco are specified by the customer, and there are limited sources where the material can be purchased from. The material used and the composition of the material are not in Martinrea Fabco's control.
2) Product design or reformulation	No option identified: The product design is completely specified by the customer and is not within Martinrea Fabco's control. While the Facility equipment is owned by Martinrea Fabco, they cannot change the size of the part produced. The amount of scrap generated at the Manufacturing Stage is monitored and ways to reduce the amount generated are encouraged.

3) Equipment or Process Modification	<p>No option identified: Martinrea Fabco conducts regular preventative maintenance on all equipment to ensure it is operating efficiently. The process is highly specialized and due to the unique chemistry of the process modifications are not possible.</p>
4) Spill and Leak prevention	<p>No option identified: All of Martinrea Fabco's raw materials are solids. Spill and leak prevention is not a concern and an option cannot be identified in this category that would result in a reduction in the production of PM2.5.</p>
5) On-site reuse or recycling	<p>No option identified: All metal scrap generated at the Facility is recycled. Martinrea Fabco is paid for all scrap metal, and therefore the recovery of scrap metal has already been optimized. Martinrea Fabco re-works off-spec parts into the processes where possible. Any parts that are unable to be re-worked are recycled.</p>
6) Improve inventory management or purchasing techniques	<p>No option identified: Martinrea Fabco's inventory is controlled by customer demand. The Facility has limited inventory at any given time, which addresses any issues of stock rotation (additionally, metal does not have an expiry date).</p>
7) Training or improved operating practices	<p>No option identified: Employees are trained on each piece of machinery, and the requirements for every part that the Facility produces. Work instruction and quality control documents are posted at every work station.</p> <p>Quality checks are completed by operators and by Quality Auditors several times per shift to ensure that all parts are conforming to customer specification. All parts also go through a central/final inspection where parts are verified and another final inspection is completed before the Package and Shipping Process.</p> <p>Employees are trained on any changes or updates to the production of parts and the quality system document is used to document the training and entered on each employee's file.</p> <p>TRW conducts continuous improvement meetings and production meetings to ensure issues are dealt with and communicated as soon as possible to ensure the quality of parts are in conformance with the customer demands.</p>

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for the creation of PM2.5.

Certification by Highest Ranking Employee

Attached.

Certification by Licensed Planner

Attached.

6.7.3 Technical Feasibility

Refer to Section 6.7.1

6.7.4 Economic Feasibility

Refer to Section 6.7.1.

7. Plan Certifications

7.1 Certification by Highest Ranking Employee

As of September 21, 2015, I, Don Gillier, 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.

[PM2.5]



Don Gillier
General Manager

10/30/2015

Date

As of September 21, 2015, I, Erik Martinez certify that I am familiar with the processes at Martinrea 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 August 20, 2015 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

[PM2.5]



Erik Martinez
Toxic Substance Reduction Planner
License No. TSRP0005

11/11/2015

Date