HARBISONWALKER INTERNATIONAL CORP – 2689 INDUSTRIAL PARK ROAD, SMITHVILLE

TOXICS REDUCTION ACT, O. REG. 455/09 – 2019RY PUBLIC REPORT

The Toxics Reduction Act and O. Reg. 455/09 went into effect on January 1, 2010. This Act requires companies with the NAICS code beginning with 31, 32, 33 or 212 and that meet NPRI and/or acetone reporting thresholds, to report their toxic substance accountings and to create/update a Toxics Reduction Plan for the reportable substances. Section 27 (1) of the Regulation requires companies to prepare/update public reports with the following information.

The HarbisonWalker International Corp. (HWI) facility at 2689 Industrial Park Road, Smithville uses chromium in manufactured products. Chromium is considered a toxic material; therefore, the site is required to track and quantify chromium usage annually and develop a toxic substance reduction plan.

Name & CAS # of Substance(s)								
Chromium (and its	NA - 04							
compounds)								
Facility Identification and Site Address								
Company Name	HarbisonWalker International Corp.							
Facility Name	HarbisonWalker International Corp.							
Facility Address	2689 Industrial Park Road, Smithville, ON, LOR 2A0							
Spatial Coordinates of Facility	619230m E 4772949m N (zone 17)							
Number of Employees	38							
NPRI ID	3266							
Primary North American Industrial Classification System Code (NAICS)								
2 Digit NAICS Code	32 – Manufacturing							
4 Digit NAICS Code	3271 – Clay product and refractory manufacturing							
6 Digit NAICS Code	327120 – Clay building material and refractory manufacturing							
Company Contact Information								
Facility Public Contact	John Oliveira, Plant Manager							
	Email: JOliveira@THINKHWI.com							
	Phone: 905-957-3311 ext. 326							

BASIC FACILITY INFORMATION

PLAN SUMMARY – CHROMIUM (AND ITS COMPOUNDS)

STATEMENT OF INTENT

HarbisonWalker International Corp. (HWI), formerly ANH Refractories Canada Inc., is committed to taking a leadership role in protecting the environment. Whenever feasible, we will reduce the use of Chromium and Hexavalent Chromium in compliance with all Federal and Provincial Regulations. We are committed to using our on-going continual improvement programs as a method to look for opportunities to reduce the use of Chromium and Hexavalent Chromium. We are committed to implementing this plan and reducing the amount of Chromium used at this facility.

OBJECTIVES

HWI will continue to work with our customers to look for opportunities to reduce the use of Chromium and Hexavalent Chromium. HWI's objective is to reduce the amount of Chromium used at the Smithville facility.

DESCRIPTION OF WHY CHROMIUM IS USED AT THE FACILITY

Chromium (excluding hexavalent chromium) is used in the facility manufacturing processes as a formulation component. It also enters the facility in the form of spent refractory products from Glass Furnaces returned by customers and in the form of finished products sent from exterior manufacturers for distribution to customers.

REDUCTION OPTIONS IMPLEMENTED

The following reduction option has been implemented:

• Institute procedures to ensure that materials do not stay in inventory beyond shelf-life

TOXIC SUBSTANCE REDUCTION PLANNER CONTACT INFORMATION

Planner Contact Information			
Planner Responsible for	Lianne Sinclair, P. Eng., EP(CEA)	TSRP0042	
Making Recommendations	Senior Mgmt Systems Consultant		
	ottawa@blumetric.ca	BluMetric Environmental Inc.	
	Phone: 613-839-3053	3108 Carp Road	
	Fax: 613-839-5376	Ottawa, ON, K0A 1L0	
Planner Responsible for	Lianne Sinclair, P. Eng., EP(CEA)	Contact information:	
Certification	Senior Mgmt Systems Consultant		
	ottawa@blumetric.ca	BluMetric Environmental Inc.	
	Phone: 613-839-3053	3108 Carp Road	
	Fax: 613-839-5376	Ottawa, ON, K0A 1L0	

CERTIFICATIONS

The plan has not been amended since it was initially developed; the following are the certification statements from the TRA reduction plan for Chromium.

11. CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 21, 2012, 1, John Oliveira, certify that 1 have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with its 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.

Chromium and its compounds Hexavalent/Chromium

Please contact facility to view signature.

[/] John Oliveira Plant Manager ANH Refractories Canada Inc.

12. CERTIFICATION BY TOXIC SUBSTANCE REDUCTION PLANNER

As of December 21, 2012 I, Lianne Sinclair certify that I am familiar with the processes at ANH Refractories Canada, that use and 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 plan dated December 21, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under the Act.

Chromium and its compounds, December 21, 2012 Hexavalent Chromium, December 21, 2012

Please contact facility to view signature.

Lianne Sinclair, P. Eng., EP (CEA) (Planner License # TSRP0042) Senior Management Systems Consultant WESA Inc. a Division of BluMetric Environmental Inc.

ANNUAL REPORT – CHROMIUM (AND ITS COMPOUNDS)

TRACKING AND QUANTIFICATION

Reporting	Facility-wide Chromium Quantities (tonnes)								
Year	Used	Created	Contained in Product	Released to Air	Off-Site Disposal	Off-Site Transfer for Treatment	Off-Site Transfer for Recycling	Reasons for Change From Previous Year	
2011	>1,000 to 10,000	0	>100 to 1000	0.070	14.700	0.840	4.720		
2012	>100 to 1,000	0	>100 to 1000	0.022	7.587	32.755	2.788	Decrease in production levels. Change in testing specifications for waste classification.	
2013	>100 to 1000	0	>100 to 1000	0.015	8.324	0	0	Decrease in production levels. There were no materials transferred off-site for treatment in 2013.	
2014	>1000 to 10,000	0	>1000 to 10,000	0.017	18.591	0	50.713	Increase in production levels. Materials from 2013 and 2014 were transferred off-site in 2014.	
2015	>100 to 1000	0	>100 to 1000	0.016	5.989	0	0	Decrease in production levels. There were no materials transferred off-site for treatment in 2015. No chrome-alumina materials entering or leaving the process.	
2016	>100 to 1000	0	>100 to 1000	0.0155	5.672	0	0	Decrease in production levels. There were no materials transferred off-site for treatment in 2015. No chrome-alumina materials entering or leaving the process.	
2017	>1000 to 10,000	0	>1000 to 10,000	0.022	13.319	0	0	Increase in production levels. Recycling and disposal amount will vary from year to year.	
2018	>1000 to 10,000	0	>1000 to 10,000	0.027	8.997	7.059	0	Increase in production levels. Recycling and disposal amount will vary from year to year.	
2019	>1000 to 10,000	0	>1000 to 10,000	0.0224	7.911	0	0	Decrease in production levels. Recycling and disposal amount will vary from year to year.	
Change from previous year (2019 : 2018)	-17%	0%	- 16%	-17%	-12%	-100%	0%		

Used, created and contained in product can be expressed in the following ranges:

> > 0 to 1

> > 1 to 10

> 10 to 100

> 100 to 1,000

> > 10,000 to 100,000

> 100,000 to 1,000,000

ANNUAL REPORT CERTIFICATION STATEMENT

As of July 31, 2020, I, John Oliveira, 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 the Act.

- Chromium (and its compounds)

John Oliveira Plant Manager HarbisonWalker International Corp.

Signed copy available for viewing at the facility located at 2689 Industrial Park Road, Smithville, Ontario, Canada.