



National Pollutant Release Inventory (NPRI) and Partners



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Report Preview

Report Details

| | |
|---------------------|--------------------|
| Report Year | 2020 |
| Report Type: | NPRI,ON MECP TRA |
| Report Status: | Ready to Submit |
| Modified Date/Time: | 2021-07-09 3:14 PM |

Company and Facility Details

| | |
|-------------------|---|
| Company Name: | Vehcom Manufacturing |
| Business Number: | 103333662 |
| Mailing Address: | Delivery Mode: GeneralDelivery Address Line 1: 74 Campbell Road City: Guelph Province/Territory: Ontario Postal Code: N1H 1C1 Country: Canada |
| Facility Name: | VEHCOM MANUFACTURING |
| NAICS Code: | 336110 |
| NPRI ID: | 7060 |
| Portable: | No |
| Physical Address: | Address Line 1: 74 Campbell Road City: Guelph Province/Territory: Ontario Postal Code: N1H 1C1 Country: Canada Latitude: 43.5495 Longitude: -80.288 UTM Zone: 17 UTM Easting: 557466 UTM Northing: 4822105 |

Parent Companies

| | |
|-------------------|--------------------------------------|
| Company Name: | Linamar Corporation |
| Business Number: | 103333662 |
| DUNS Number | 206993862 |
| Percentage owned: | 100.00 |
| Civic Address: | Address Line 1: 287 Speedvale Avenue |

City: Guelph
Province/Territory: Ontario
Postal Code: N1H 1C5
Country: Canada

Contacts Details

| | |
|--------------|-----------------------------|
| Contact Type | Technical Contact |
| Name: | Nelson Pimentel |
| Position: | Quality Manager |
| Telephone: | 5198211650 |
| Extension | 22606 |
| Email: | nelson.pimentel@linamar.com |

| | |
|--------------|---|
| Contact Type | Certifying Official, Highest Ranking Employee |
| Name: | Thomas Horvat |
| Position: | General Manager |
| Telephone: | 5198211650 |
| Extension | 22600 |
| Fax: | 5198219774 |
| Email: | thomas.horvat@linamar.com |

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|--------------|--------------------------------|
| Contact Type | Person who prepared the report |
| Name: | Laura Raetsen |
| Position: | EHS Coordinator |
| Telephone: | 5198211650 |
| Extension | 22346 |
| Email: | laura.raetsen@linamar.com |

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|------------------|--|
| Mailing Address: | Delivery Mode: GeneralDelivery Address Line 1: 74 Campbell Road City: Guelph Province/Territory: Ontario Postal Code: N1H 1C1 Country: Canada |
|------------------|--|

General Information

| | |
|---|--------------------------------------|
| Number of employees: | 412 |
| Activities for Which the 20,000-Hour Employee Threshold Does Not Apply: | None of the above |
| Activities Relevant to Reporting Dioxins, Furans and Hexacholorobenzene: | None of the above |
| Activities Relevant to Reporting of Polycyclic Aromatic Hydrocarbons (PAHs): | Wood preservation using creosote: No |
| Does this facility release less than the reporting threshold for each Part 4 substance AND have one or more light or medium crude oil batteries with a total oil throughput for the | No |

battery components of the facility of $\geq 1,900$ m³ per year?

Did the facility operate one or more electricity generation units that had a capacity of 25 MW or more and that distributed or sold to the grid 33% or more of its potential electrical output in the calendar year?

No

Is this the first time the facility is reporting to the NPRI (under current or past ownership):

No

Is the facility controlled by another Canadian company or companies:

Yes

Does this facility solely consist of compression equipment in the oil and gas extraction sector?

No

Is the facility required to report one or more NPRI Part 4 substances (Criteria Air Contaminants):

No

Substance List

| CAS RN | Substance Name | Releases | Releases (Speciated VOCs) | Disposals | Recycling | Unit |
|---------|-------------------------------|----------|---------------------------|-----------|-----------|--------|
| NA - 04 | Chromium (and its compounds) | N/A | N/A | N/A | 79.210000 | tonnes |
| NA - 06 | Copper (and its compounds) | N/A | N/A | N/A | 25.740000 | tonnes |
| NA - 09 | Manganese (and its compounds) | N/A | N/A | N/A | 72.150000 | tonnes |

Applicable Programs

| CAS RN | Substance Name | NPRI | ON MECP TRA | First report for this substance to the ON MECP TRA |
|---------|-------------------------------|------|-------------|--|
| NA - 04 | Chromium (and its compounds) | Yes | Yes | No |
| NA - 06 | Copper (and its compounds) | Yes | Yes | No |
| NA - 09 | Manganese (and its compounds) | Yes | Yes | No |

General Information about the Substance - Releases and Transfers of the Substance

| CAS RN | Substance Name | Was the substance released on-site | The substance will be reported as the sum of releases to all media (total of 1 tonne or less) | 1 tonne or more of a Part 5 Substance (Speciated VOC) was released to air |
|---------|-------------------------------|------------------------------------|---|---|
| NA - 04 | Chromium (and its compounds) | No | No | No |
| NA - 06 | Copper (and its compounds) | No | No | No |
| NA - 09 | Manganese (and its compounds) | No | No | No |

General Information about the Substance - Disposals and Off-site Transfers for Recycling

| CAS RN | Substance Name | Was the substance disposed of (on-site or off-site), or transferred for treatment prior to final disposal | Is the facility required to report on disposals of tailings and waste rock for the selected reporting period | Was the substance transferred off-site for recycling |
|---------|-------------------------------|---|--|--|
| NA - 04 | Chromium (and its compounds) | No | No | Yes |
| NA - 06 | Copper (and its compounds) | No | No | Yes |
| NA - 09 | Manganese (and its compounds) | No | No | Yes |

General Information about the Substance - Nature of Activities

| CAS RN | Substance Name | Manufacture the Substance | Process the Substance | Otherwise Use of the Substance |
|---------|-------------------------------|----------------------------|-------------------------|--------------------------------|
| NA - 04 | Chromium (and its compounds) | For on-site use/processing | As an article component | |
| NA - 06 | Copper (and its compounds) | For on-site use/processing | As an article component | |
| NA - 09 | Manganese (and its compounds) | For on-site use/processing | As an article component | |

TRA Quantifications

| CAS RN | Substance Name | Use, Creation, Contained in Product | Quantity | Use ranges for public reporting |
|---------|-------------------------------|-------------------------------------|---------------|---------------------------------|
| NA - 04 | Chromium (and its compounds) | Use | 271.95 tonnes | No |
| NA - 04 | Chromium (and its compounds) | Creation | 0 tonnes | No |
| NA - 04 | Chromium (and its compounds) | Contained in Product | 192.73 tonnes | No |
| NA - 06 | Copper (and its compounds) | Use | 97.06 tonnes | No |
| NA - 06 | Copper (and its compounds) | Creation | 0 tonnes | No |
| NA - 06 | Copper (and its compounds) | Contained in Product | 71.32 tonnes | No |
| NA - 09 | Manganese (and its compounds) | Use | 251.16 tonnes | No |
| NA - 09 | Manganese (and its compounds) | Creation | 0 tonnes | No |
| NA - 09 | Manganese (and its compounds) | Contained in Product | 179.00 tonnes | No |

TRA Quantifications - Others

| CAS RN | Substance Name | Change in Method of Quantification | Reasons for Change | Description of how the change impact tracking and quantification of the substance | Description of how an incident(s) affected quantifications | Significant Process Change | Reason for the significant process change |
|---------|-------------------------------|------------------------------------|--------------------|---|--|----------------------------|---|
| NA - 04 | Chromium (and its compounds) | | | | | No | |
| NA - 06 | Copper (and its compounds) | | | | | No | |
| NA - 09 | Manganese (and its compounds) | | | | | No | |

On-site Releases - Reasons for Changes in Quantities Released from Previous Year

| CAS RN | Substance Name | Reasons for Changes in Quantities from Previous Year | Comments |
|---------|-------------------------------|--|--|
| NA - 04 | Chromium (and its compounds) | Other (specify in comment field) | Chromium (and its compounds) is not released on-site. |
| NA - 06 | Copper (and its compounds) | Other (specify in comment field) | Copper (and its compounds) is not released on-site. |
| NA - 09 | Manganese (and its compounds) | Other (specify in comment field) | Manganese (and its compounds) is not released on-site. |

Disposals - Reasons and Comments

| CAS RN | Substance Name | Reasons Why Substance Was Disposed | Reasons for Changes in Quantities from Previous Year | Comments |
|---------|-------------------------------|------------------------------------|--|---|
| NA - 04 | Chromium (and its compounds) | | Other (specify in comment field) | Chromium (and its compounds) is not disposed of (on-site or off-site), or transferred for treatment prior to final disposal. |
| NA - 06 | Copper (and its compounds) | | Other (specify in comment field) | Copper (and its compounds) is not disposed of (on-site or off-site), or transferred for treatment prior to final disposal. |
| NA - 09 | Manganese (and its compounds) | | Other (specify in comment field) | Manganese (and its compounds) is not disposed of (on-site or off-site), or transferred for treatment prior to final disposal. |

Recycling - Off-site Transfers for Recycling

| CAS RN | Substance Name | Category | Basis of Estimate | Detail Code | Quantity |
|---------|-------------------------------|--|-------------------|-------------|--------------|
| NA - 04 | Chromium (and its compounds) | Recovery of Metals and Metal Compounds | C - Mass Balance | | 79.21 tonnes |
| NA - 06 | Copper (and its compounds) | Recovery of Metals and Metal Compounds | C - Mass Balance | | 25.74 tonnes |
| NA - 09 | Manganese (and its compounds) | Recovery of Metals and Metal Compounds | C - Mass Balance | | 72.15 tonnes |

Recycling - Off-site Transfers for Recycling - Total

| CAS RN | Substance Name | Total - Off-site Transfers for Recycling |
|---------|-------------------------------|--|
| NA - 04 | Chromium (and its compounds) | 79.21 tonnes |
| NA - 06 | Copper (and its compounds) | 25.74 tonnes |
| NA - 09 | Manganese (and its compounds) | 72.15 tonnes |

Recycling - Off-site Transfers for Recycling - By Facility

| CAS RN | Substance Name | Category | Off-site Name | Off-site Address | Quantity |
|---------|-------------------------------|--|------------------------------------|------------------------------------|--------------|
| NA - 04 | Chromium (and its compounds) | Recovery of Metals and Metal Compounds | Gerdau Ameristeel Metals Recycling | 200 Dawson Rd., Guelph, ON, Canada | 79.21 tonnes |
| NA - 06 | Copper (and its compounds) | Recovery of Metals and Metal Compounds | Gerdau Ameristeel Metals Recycling | 200 Dawson Rd., Guelph, ON, Canada | 25.74 tonnes |
| NA - 09 | Manganese (and its compounds) | Recovery of Metals and Metal Compounds | Gerdau Ameristeel Metals Recycling | 200 Dawson Rd., Guelph, ON, Canada | 72.15 tonnes |

Recycling - Reasons and Comments

| CAS RN | Substance Name | Reasons Why Substance Was Recycled | Reasons for Changes in Quantities Recycled from Previous Year | Comments |
|---------|-------------------------------|---|---|----------|
| NA - 04 | Chromium (and its compounds) | Production Residues Off-specification products Unusable parts or discards | No significant change (i.e. <10% or no change) | |
| NA - 06 | Copper (and its compounds) | Production Residues Off-specification products Unusable parts or discards | No significant change (i.e. <10% or no change) | |
| NA - 09 | Manganese (and its compounds) | Production Residues Off-specification products Unusable parts or discards | No significant change (i.e. <10% or no change) | |

Comparison Report - Enters, Creation, Contained in Product

| CAS RN | Substance Name | Is Breakdown | Category | Quantity | Last Reported Quantity | Reporting Period of Last Reported Quantity | Change | % Change |
|---------|-------------------------------|--------------|---------------------------|---------------|------------------------|--|--------|----------|
| NA - 04 | Chromium (and its compounds) | No | Enters the facility (Use) | 271.95 tonnes | 314.53 tonnes | 2019 | -42.58 | -13.54 |
| NA - 04 | Chromium (and its compounds) | No | Creation | 0 tonnes | 0 tonnes | 2018 | 0 | |
| NA - 04 | Chromium (and its compounds) | No | Contained in Product | 192.73 tonnes | 192.09 tonnes | 2018 | 0.64 | 0.33 |
| NA - 06 | Copper (and its compounds) | No | Enters the facility (Use) | 97.06 tonnes | 164.94 tonnes | 2019 | -67.88 | -41.15 |
| NA - 06 | Copper (and its compounds) | No | Creation | 0 tonnes | 0 tonnes | 2019 | 0 | |
| NA - 06 | Copper (and its compounds) | No | Contained in Product | 71.32 tonnes | 128.49 tonnes | 2019 | -57.17 | -44.49 |
| NA - 09 | Manganese (and its compounds) | No | Enters the facility (Use) | 251.16 tonnes | 293.35 tonnes | 2019 | -42.19 | -14.38 |
| NA - 09 | Manganese (and its compounds) | No | Creation | 0 tonnes | 0 tonnes | 2018 | 0 | |
| NA - 09 | Manganese (and its compounds) | No | Contained in Product | 179.00 tonnes | 180.71 tonnes | 2018 | -1.71 | -0.95 |

Comparison Report - Enters, Creation, Contained in Product : Reason(s) for Change

| CAS RN | Substance Name | Reason(s) for Change | Other Reason |
|---------|-------------------------------|-------------------------------|--------------|
| NA - 04 | Chromium (and its compounds) | Increase in production levels | |
| NA - 06 | Copper (and its compounds) | Decrease in production levels | |
| NA - 09 | Manganese (and its compounds) | Increase in production levels | |

Comparison Report - Transfers off-site for Recycling

| CAS RN | Substance Name | Is Breakdown | Category | Quantity | Last Reported Quantity | Reporting Period of Last Reported Quantity | Change | % Change |
|---------|-------------------------------|--------------|--|--------------|------------------------|--|--------|----------|
| NA - 04 | Chromium (and its compounds) | No | Total off-site Transfers for Recycling | 79.21 tonnes | 117.37 tonnes | 2019 | -38.16 | -32.51 |
| NA - 06 | Copper (and its compounds) | No | Total off-site Transfers for Recycling | 25.74 tonnes | 36.79 tonnes | 2019 | -11.05 | -30.04 |
| NA - 09 | Manganese (and its compounds) | No | Total off-site Transfers for Recycling | 72.15 tonnes | 112.64 tonnes | 2019 | -40.49 | -35.95 |

Comparison Report - Transfers off-site for Recycling - Reason(s) for Change

| CAS RN | Substance Name | Reason(s) for Change | Other Reason |
|--------|----------------|----------------------|--------------|
|--------|----------------|----------------------|--------------|

| CAS RN | Substance Name | Reason(s) for Change | Other Reason |
|---------|-------------------------------|--|--------------|
| NA - 04 | Chromium (and its compounds) | No reasons - quantities approximately the same | |
| NA - 06 | Copper (and its compounds) | No reasons - quantities approximately the same | |
| NA - 09 | Manganese (and its compounds) | No reasons - quantities approximately the same | |

Pollution Prevention

Does the facility have a documented pollution prevention plan?

No

Did the facility complete any pollution prevention activities in the current NPRI reporting year

No

If no, please select all applicable reasons from the list below:

Other (please specify): Chromium, copper and manganese are article components of the raw material and a by-product of the finished goods from machining operations. All scrap metal generated as a part of our operations is recycled/recovered. Therefore, no pollution prevention activities are applicable at this time.

Progress on TRA Plan - Objectives

| CAS RN | Substance Name | Objectives |
|---------|-------------------------------|--|
| NA - 04 | Chromium (and its compounds) | Vehcom prides itself on technological innovation in order to produce high quality automotive parts in an environmentally responsible manner. Through this plan, Vehcom determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time. |
| NA - 06 | Copper (and its compounds) | Vehcom prides itself on technological innovation in order to produce high quality automotive parts in an environmentally responsible manner. Through this plan, Vehcom determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time. |
| NA - 09 | Manganese (and its compounds) | Vehcom prides itself on technological innovation in order to produce high quality automotive parts in an environmentally responsible manner. Through this plan, Vehcom determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time |

Progress on TRA Plan - Use Targets

| CAS RN | Substance Name | Quantity | Years | Description of Target |
|---------|-------------------------------|------------|-------|-----------------------|
| NA - 04 | Chromium (and its compounds) | 469.4 kg | 2 | End of 2014 |
| NA - 06 | Copper (and its compounds) | 1485.5 kg | 2 | End of 2014 |
| NA - 09 | Manganese (and its compounds) | 1961.67 kg | 2 | End of 2014 |

Progress on TRA Plan - Creation Targets

| CAS RN | Substance Name | Quantity | Years | Description of Target |
|---------|-------------------------------|--------------------|--------------------|-----------------------|
| NA - 04 | Chromium (and its compounds) | No quantity target | No timeline target | |
| NA - 06 | Copper (and its compounds) | No quantity target | No timeline target | |
| NA - 09 | Manganese (and its compounds) | No quantity target | No timeline target | |

Progress on TRA Plan - Toxic Reduction Options Implemented

| CAS RN | Substance Name | Activity | Steps that were taken in the reporting period to implement the toxic reduction option | Public summary of the description of the steps | Comparison of the steps that were described in the plan for implementation with the actual steps taken during the reporting period | Public summary of the comparison of the steps |
|---------|------------------------------|--|--|--|--|--|
| NA - 04 | Chromium (and its compounds) | Other | Vehcom worked with suppliers to reduce foundry defects. The amount of scrap parts was also reduced by increasing employee awareness and operator training. | Vehcom worked with suppliers to reduce foundry defects. The amount of scrap parts was also reduced by increasing employee awareness and operator training. | Same as TRA plan. | Vehcom worked with suppliers to reduce foundry defects. The amount of scrap parts was also reduced by increasing employee awareness and operator training. |
| NA - 04 | Chromium (and its compounds) | Training related to toxics substance reduction | Vehcom reduced the amount of scrap parts by increasing employee awareness and operator training. | Vehcom reduced the amount of scrap parts by increasing employee awareness and operator training. | Same as TRA plan | Vehcom reduced the amount of scrap parts by increasing employee awareness and operator training. |
| | Copper | | Vehcom worked with suppliers to reduce foundry defects pertaining to copper and reduce | Vehcom worked with suppliers to reduce foundry defects pertaining to copper and reduce | | Vehcom worked with suppliers to reduce foundry defects pertaining to copper and reduce |

| CAS RN | Substance Name | Activity | Steps that were taken in the reporting period to implement the toxic reduction option | Public summary of the description of the steps | Comparison of the steps that were described in the plan for implementation with the actual steps taken during the reporting period | Public summary of the comparison of the steps |
|---------|-------------------------------|--|---|---|--|---|
| NA - 06 | (and its compounds) | Other | material being disposed of. The amount of scrap parts was also reduced by increasing employee awareness and operator training. | material being disposed of. The amount of scrap parts was also reduced by increasing employee awareness and operator training. | Same as TRA plan | material being disposed of. The amount of scrap parts was also reduced by increasing employee awareness and operator training. |
| NA - 06 | Copper (and its compounds) | Changed product specifications | Vehcom worked with suppliers to reduce foundry defects pertaining to copper and reduce material being disposed of. The amount of scrap parts was also reduced by increasing employee awareness and operator training. | Vehcom worked with suppliers to reduce foundry defects pertaining to copper and reduce material being disposed of. The amount of scrap parts was also reduced by increasing employee awareness and operator training. | Same as TRA plan | Vehcom worked with suppliers to reduce foundry defects pertaining to copper and reduce material being disposed of. The amount of scrap parts was also reduced by increasing employee awareness and operator training. |
| NA - 06 | Copper (and its compounds) | Training related to toxics substance reduction | Production employees were trained to reduce machining scrap, thus reducing disposal of material. | Production employees were trained to reduce machining scrap, thus reducing disposal of material. | Same as TRA plan | Production employees were trained to reduce machining scrap, thus reducing disposal of material. |
| NA - 09 | Manganese (and its compounds) | Other | Vehcom worked with suppliers to reduce foundry defects pertaining to manganese in order to reduce materials being disposed of. The amount of scrap parts was also reduced by increasing employee awareness and operator training. | Vehcom worked with suppliers to reduce foundry defects pertaining to manganese in order to reduce materials being disposed of. The amount of scrap parts was also reduced by increasing employee awareness and operator training. | Same as TRA plan | Vehcom worked with suppliers to reduce foundry defects pertaining to manganese in order to reduce materials being disposed of. The amount of scrap parts was also reduced by increasing employee awareness and operator training. |
| NA - 09 | Manganese (and its compounds) | Changed product specifications | Customer specification guides in material used. | Customer specification guides in material used. | Same as TRA plan | Customer specification guides in material used. |
| NA - 09 | Manganese (and its compounds) | Training related to toxics substance reduction | Production employees were trained to reduce machining scrap, thus reducing disposal of material. | Production employees were trained to reduce machining scrap, thus reducing disposal of material. | Same as TRA plan | Production employees were trained to reduce machining scrap, thus reducing disposal of material. |

| CAS RN | Substance Name | Activity | Will the timelines in the current version of the plan will be met | Comments: |
|---------|-------------------------------|--|---|-----------|
| NA - 04 | Chromium (and its compounds) | Other | Yes | |
| NA - 04 | Chromium (and its compounds) | Training related to toxics substance reduction | Yes | |
| NA - 06 | Copper (and its compounds) | Other | Yes | |
| NA - 06 | Copper (and its compounds) | Changed product specifications | Yes | |
| NA - 06 | Copper (and its compounds) | Training related to toxics substance reduction | Yes | |
| NA - 09 | Manganese (and its compounds) | Other | Yes | |
| NA - 09 | Manganese (and its compounds) | Changed product specifications | Yes | |
| NA - 09 | Manganese (and its compounds) | Training related to toxics substance reduction | Yes | |

Progress on TRA Plan - Reductions due to Options Implemented - Materials or feedstock substitution

| CAS RN | Substance Name | Activity | Reductions due to Options Implemented | Quantity |
|---------|------------------------------|----------|--|-----------|
| NA - 04 | Chromium (and its compounds) | Other | The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the steps described: | No Amount |
| NA - 04 | Chromium (and its compounds) | Other | The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the steps described: | No Amount |
| NA - 04 | Chromium (and its compounds) | Other | The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the steps described: | No Amount |
| NA - 04 | Chromium (and its compounds) | Other | The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the steps described: | No Amount |
| NA - 04 | Chromium (and its compounds) | Other | The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the steps described: | No Amount |
| NA - 04 | Chromium (and its compounds) | Other | The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to steps described: | No Amount |
| NA - 04 | Chromium (and its compounds) | Other | The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described: | No Amount |
| NA - 04 | Chromium (and its compounds) | Other | The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described: | No Amount |

| CAS RN | Substance Name | Activity | Reductions due to Options Implemented | Quantity |
|---------|-------------------------------|--|--|-----------|
| NA - 09 | Manganese (and its compounds) | Training related to toxics substance reduction | The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the steps described: | No Amount |
| NA - 09 | Manganese (and its compounds) | Training related to toxics substance reduction | The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the steps described: | No Amount |
| NA - 09 | Manganese (and its compounds) | Training related to toxics substance reduction | The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to steps described: | No Amount |
| NA - 09 | Manganese (and its compounds) | Training related to toxics substance reduction | The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described: | No Amount |
| NA - 09 | Manganese (and its compounds) | Training related to toxics substance reduction | The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described: | No Amount |
| NA - 09 | Manganese (and its compounds) | Training related to toxics substance reduction | The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the steps described: | No Amount |

Progress on TRA Plan - Additional Actions

| CAS RN | Substance Name | Were there any additional actions outside the plan taken during the reporting period to reduce the use and/or creation of the substance? | Describe any additional actions that were taken during the reporting period to achieve the plan's objectives | Provide a public summary of the description of the additional action taken |
|---------|-------------------------------|--|--|--|
| NA - 04 | Chromium (and its compounds) | No | | |
| NA - 06 | Copper (and its compounds) | No | | |
| NA - 09 | Manganese (and its compounds) | No | | |

Progress on TRA Plan - Reductions due to additional actions taken

| CAS RN | Substance Name | Reductions due to additional actions taken | Quantity |
|---------|------------------------------|---|----------|
| NA - 04 | Chromium (and its compounds) | The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 04 | Chromium (and its compounds) | The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 04 | Chromium (and its compounds) | The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 04 | Chromium (and its compounds) | The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 04 | Chromium (and its compounds) | The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 04 | Chromium (and its compounds) | The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to additional actions. | |
| NA - 04 | Chromium (and its compounds) | The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 04 | Chromium (and its compounds) | The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 04 | Chromium (and its compounds) | The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 06 | Copper (and its compounds) | The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 06 | Copper (and its compounds) | The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 06 | Copper (and its compounds) | The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 06 | Copper (and its compounds) | The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 06 | Copper (and its compounds) | The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 06 | Copper (and its compounds) | The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to additional actions. | |
| NA - 06 | Copper (and its compounds) | The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 06 | Copper (and its compounds) | The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions. | |

| CAS RN | Substance Name | Reductions due to additional actions taken | Quantity |
|---------|-------------------------------|---|----------|
| NA - 06 | Copper (and its compounds) | The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 09 | Manganese (and its compounds) | The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 09 | Manganese (and its compounds) | The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 09 | Manganese (and its compounds) | The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 09 | Manganese (and its compounds) | The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 09 | Manganese (and its compounds) | The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 09 | Manganese (and its compounds) | The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to additional actions. | |
| NA - 09 | Manganese (and its compounds) | The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 09 | Manganese (and its compounds) | The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions. | |
| NA - 09 | Manganese (and its compounds) | The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the additional actions. | |

Progress on TRA Plan - Amendments

| CAS RN | Substance Name | Were any amendments made to the toxic substance reduction plan during the reporting period | Description any amendments that were made to the toxic substance reduction plan during the reporting period | Provide a public summary of the description of any amendments that were made to the toxic substance reduction plan during the reporting period |
|---------|-------------------------------|--|---|--|
| NA - 04 | Chromium (and its compounds) | No | | |
| NA - 06 | Copper (and its compounds) | No | | |
| NA - 09 | Manganese (and its compounds) | No | | |

Feedback

Comments on the Reporting System

Completely satisfied. The reporting system works well and saves me time.

Version: 3.18.5



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