

## TRA ANNUAL REPORT (2017 Reporting Year)

This *Toxics Reduction Act* (TRA) Annual Report has been prepared in accordance with, and satisfies the requirements of Section 10 of the *Toxics Reduction Act* (TRA) and Section 27 of Ontario Regulation (O.Reg.) 455/09 for the TRA toxic substances identified in the table below.

### Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number for the Substances whose Toxic Substance Reduction Plans are covered by this Report on Toxic Substance Reduction Plans	This TRA Annual Report applies to the Toxic Substance Reduction Plan for the prescribed Toxic Substance "Zinc" (Per O.Reg.455/09, no single CAS number applies to this substance)
National Pollutant Release Inventory (NPRI) and O.Reg.127/01 Identification Numbers	NPRI ID: 5960
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	Bull Moose Tube Ltd. 2170 Queensway Drive Burlington, Ontario, Canada L7R 3T1
The number of full time employee equivalents at the facility	44
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	33 - Manufacturing 3312 – Steel Product Manufacturing from Purchased Steel 331210 - Iron & Steel Pipes & Tubes Mfg.
Public contact	Tom Csiszar 2170 Queensway Drive Burlington, Ontario, Canada L7R 3T1 (905) 637-8261
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	UTM Zone 17 596151,4799244

## **List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility**

The lone substance for which the Facility has been required to prepare a Toxic Substance Reduction Plan is:

Zinc (Per O.Reg.455/09, “no single CAS number applies to this substance”)

### **Toxic Substance Accounting Information**

Refer to Appendix A: TRA Toxic Substance Quantification and Accounting Summary for the information required under s.12(1) of O.Reg.455/09.

### **Comparison of Toxic Substance Accounting to the Previous Calendar Year**

Refer to Appendix B: Comparison of Toxic Substance Quantification and Accounting to the Previous Calendar Year for the information required by s.26(2) of O.Reg.455/09.

### **Changes in Quantification Methods**

There were no changes made to any quantification methods since the preparation of the Toxic Substance accounting information for the previous calendar year.

### **Objectives of Toxic Substance Reduction Plans**

The objectives of the Toxic Substance Reduction Plan for Zinc are as follows:

- provide support for the Facility’s position with respect to the Statement of Intent; and
- document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance covered.

### **Toxic Substance Reduction Options Identified in Toxic Substance Reduction Plans**

No toxic substance reduction options were identified the Toxic Substance Reduction Plan for Zinc and therefore the information required by s.26(2)4, s.26(2)5 and s.26(2)6 is not applicable for this Report.

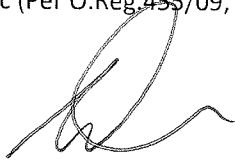
### **Amendments to Toxic Substance Reduction Plans**

No amendments have been made to the Toxic Substance Reduction Plan for Zinc.

## **Certification Statement**

As of July 19, 2018, I certify that I have read the Report on the toxic substance reduction plan for the substance listed below and am familiar with its content and to my knowledge the information contained in the Report is factually accurate and the Report complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

Zinc (Per O.Reg.455/09, "no single CAS number applies to this substance")



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*Tom Csiszar*  
*Plant Manager*  
*Bull Moose Tube Ltd.*  
*2170 Queensway Drive, Burlington, ON*

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July 19, 2018

*Date*



**APPENDIX A: TRA TOXIC SUBSTANCE QUANTIFICATION AND ACCOUNTING SUMMARY**

**TRA Toxic Substance Quantification and Accounting Summary**

TRA Reportable Substance	CAS No.*	Public Reportable Values (Report to Public)			
		Unit	Use	Creation	Contained in Product
Zinc	NA-14	tonnes	>100 to 1,000	>0 to 1	>100 to 1,000

**APPENDIX B: COMPARISON OF TOXIC SUBSTANCE QUANTIFICATION AND ACCOUNTING TO  
THE PREVIOUS CALENDAR YEAR**

### TRA Quantification, Accounting and Reporting Comparison

The table below provides a comparison between the three TRA reportable activity quantities for each substance (Use, Creation, Contained in Product) for the current and previous year. The TRA requires a comment in the SWIM report for increases or decreases in these activities as compared to the previous year and therefore the comment provided on the column on the far right of each table should be provided within SWIM.

#### USE

Toxic Substance	CAS	Change in Reported Value from the Previous Year [tonnes]	% Change	Comment if Change +/- 10%
Zinc	N/A-14	-930.483	>78%	Change in Production Levels: Decreased amount of sheet steel containing zinc used. Weighted average of zinc used instead of highest percentage content resulting in lower zinc concentration.

#### CREATION

Toxic Substance	CAS*	Change in Reported Value from the Previous Year [tonnes]	% Change	Comment if Change +/- 10%
Zinc	N/A-14	0.000	—	—

#### CONTAINED IN PRODUCT

Toxic Substance	CAS*	Change in Reported Value from the Previous Year [tonnes]	% Change	Comment if Change +/- 10%
Zinc	N/A-14	-862.418	>78%	Change in Production Levels: Decreased amount of sheet steel used which results in lower of zinc content product. Weighted average of zinc used instead of highest percentage content resulting in lower zinc concentration.