



**SASKATOON**

220 3rd Avenue South,  
Suite 413,  
Saskatoon, Saskatchewan  
S7K 1M1  
T: 306.343.5500  
TF: 1.866.919.8899  
F: 306.343.3601

**REGINA**

369 Park Street,  
Regina, Saskatchewan  
S4N 5B2  
T: 306.522.6100  
TF: 1.866.919.1861  
F: 306.522.6101

**WINNIPEG**

300 - 1600 Ness Avenue,  
Madison Square  
Winnipeg, Manitoba  
R3J 3W7  
T: 204.783.1276  
TF: 1.866.919.4531  
F: 204.478.4940

**LONDON**

700 Richmond Street,  
Suite 307,  
London, Ontario  
N6A 5C7  
T: 519.452.7700  
TF: 1.866.919.4531  
F: 519.452.1712

**OTTAWA**

5310 Canotek Road,  
Unit 30,  
Ottawa, Ontario  
K1J 9N5  
T: 613.824.8900  
TF: 1.866.919.4530  
F: 613.824.8901

**IQUALUIT**

P.O. Box 957,  
Iqaluit, Nunavut  
X0A 0H0  
T: 867.979.3300  
TF: 1.866.919.4533  
F: 867.979.3302

**TOXIC SUBSTANCE REDUCTION PLAN  
SUMMARY  
FOR PHOSPHORUS (TOTAL)**

Sivaco Ontario,  
330 Thomas Street  
Ingersoll Ontario N5C 3K5

December 16, 2013





---

## Table of Contents

1	General Information .....	2
1.1	Basic Facility Information.....	2
1.2	Contact Information.....	3
2	Statement of Intent.....	3
2.1	Statement of Intent to Reduce .....	3
3	Objectives and Targets.....	3
4	Description of Why Substance is Used .....	4
5	Options to be Implemented.....	4
5.1	List of Options to be Implemented .....	4
5.2	Estimated Reductions and Associated Timeline .....	4
6	Certifications .....	5
6.1	Copy of Certification by Highest Ranking Employee.....	5
6.2	Copy of Certification by Toxic Substance Reduction Planner .....	5
7	Statement .....	5



# 1 General Information

## 1.1 Basic Facility Information

Toxic Substance Information		
Name of Substance	Phosphorus (total)	
Facility Identification and Site Address		
Company Name	SIVACO Ontario	
Facility Address	Physical Address: 330 Thomas Street, Ingersoll Ontario, N5C 3K5	Mailing Address: 330 Thomas Street, Ingersoll Ontario, N5C 3K5
Spatial Coordinates of Facility	17N 4763628 509188	<i>Expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum.</i>
Number of Employees	75	<i>Number of full time employee equivalents</i>
NPRI ID	3328	
Parent Company Information (if applicable)		
Parent Company Name	SIVACO Wire Group 2004 L.P.	
Parent Company Address	Physical Address: 1040 Country Road 17 C/O IRM LOriginal Ontario K0B 1K0	Mailing Address (if different): 700 Ouelette C/O Infasco Marieville Quebec J3M 1P6
Business Number for Parent Company	141221879	
Facility Owner Information		
Owner of the Facility		
Address of Owner	Physical Address:	Mailing Address (if different):
Facility Operator Information		
Operator of the Facility	SIVACO Ontario	
Address of Operator	Physical Address: 330 Thomas Street, Ingersoll Ontario, N5C 3K5	Physical Address: 330 Thomas Street, Ingersoll Ontario, N5C 3K5
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	33 - manufacturing	
4 Digit NAICS Code	3328 – metal coating, engraving, heat treating and allied services	



## 1.2 Contact Information

Company Contact Information		
Facility Public Contact	Name:	Lawrence Pye
	Email:	pye@sivaco.com
	Phone:	519-485-4150
	Fax:	519-485-3039
	Contact Address:	330 Thomas Street, Ingersoll Ontario, N5C 3K5
Planner Contact Information		
Person Responsible for Making Recommendations	Name:	Eric Shilts
	License Number	TSRP0083
	Email:	eric@concentriceng.com
Person Responsible for Plan Certification	Phone:	519-452-7700
	Fax:	519-452-1712
	Contact Address:	Suite 307 700 Richmond Street London Ontario N6A 5C7

## 2 Statement of Intent

### 2.1 Statement of Intent to Reduce

Phosphorus (total) is currently used by SIVACO Ontario. This facility does not create phosphorus and therefore this plan will not address reducing its creation.

While SIVACO Ontario does not intend to reduce its use of phosphorus (total), it will take proactive measures to reduce the risk of phosphorus releases.

## 3 Objectives and Targets

All employees at SIVACO Ontario will be involved in the reduction of toxic substances released at SIVACO Ontario. SIVACO Ontario is committed to implementing options (which were identified as a result of this planning exercise) which will provide a proactive approach to toxics reduction at the facility. The goal is to implement these proactive reduction options through spill and leak prevention (standard operating procedure review and revision) and improved training record keeping as per the timeline noted in this plan.

SIVACO Ontario will continue to monitor advancements in technology which may result in future reductions of phosphorus (total) at the facility.



## **4 Description of Why Substance is Used**

Zinc phosphate coatings are commonly used on steel for corrosion resistance, lubricity or as a foundation for subsequent coatings or painting. A zinc phosphate compound is used at SIVACO Ontario to deposit a zinc phosphate coating on steel surfaces. Presence of phosphorus is limited to the Zinc Phosphate Conversion Coating Stage (comprised of Zinc Phosphate Conversion Coating Process, Additional Steel Treatment Process, and Shipping Process).

## **5 Options to be Implemented**

### ***5.1 List of Options to be Implemented***

SIVACO Ontario intends to implement the sole option which was found to be technically and economically feasible for the reduction of phosphorus at its facility:

Review (and revise as necessary) current operating practices (and associated standard operating procedures) involving zinc phosphate onsite and improve training record keeping.

### ***5.2 Estimated Reductions and Associated Timeline***

SIVACO Ontario plans to implement the option to review (and revise as necessary) current operating practices (and associated standard operating procedures) involving zinc phosphate and improve record keeping of personnel training within a year. As previously mentioned, there were no reportable spills of zinc phosphate at SIVACO Ontario in 2012 and thus implementing this option will not provide immediate reductions of phosphorus at the facility. However as a result of planning exercises related to the Toxic Reduction Act and associated Regulation, SIVACO was able to identify this option as a means of providing a proactive approach to minimizing the risk of future potential releases of zinc phosphate. For purposes of providing a quantity, it is estimated that implementing this proactive option will yield anticipated reductions in release of zinc phosphate of approximately 0.01%. This exemplifies SIVACO Ontario's commitment to a continued leadership role in protecting the environment.



## 6 Certifications

### 6.1 Copy of Certification by Highest Ranking Employee

As of December 16, 2013, I, Bill Stevens, 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.

Phosphorus

Highest Ranking Employee

Date

### 6.2 Copy of Certification by Toxic Substance Reduction Planner

As of December 16, 2013, I, Eric Shilts certify that I am familiar with the processes at SIVACO Ontario 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 November 29, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Phosphorus (total)

December 16, 2013

Toxic Substance Reduction Planner

Date

## 7 Statement

The plan summary for phosphorus (total) accurately reflects the toxic substance reduction plan for phosphorus (total).