

FINAL REPORT

SANDVIK MATERIALS TECHNOLOGY CANADA

**425 MCCARTNEY STREET,
ARNPRIOR, ONTARIO**

**TOXIC SUSTANCE REDUCTION PLAN
SUMMARY (HEAVY ALKYLATE NAPHTHA)**

REF.: 615482



**Submitted:
December 18, 2013**

**Prepared by:
SNC-Lavalin Inc.
Environment & Water
Ottawa, Ontario**



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1. INTRODUCTION

SNC-Lavalin Inc. Environment & Water (E&W) was retained by Sandvik Materials Technology Canada (Sandvik), formerly Sandvik Steel Canada, (a Division of Sandvik Canada Inc.) to complete a Toxic Substances Reduction Plan for the use of heavy alkylate naphtha (Shellsol) at 425 McCartney Street, Arnprior, Ontario (the Facility). This report summarizes the general Facility information, statement of intent, reduction options and Plan Certifications.

SNC-Lavalin Inc. Environment & Water (E&W), has prepared this Plan Summary, on behalf of Sandvik. The following information meets the requirements of s. 24 of O. Reg 455/09 for the 2012 reporting year.

2. BASIC FACILITY INFORMATION

Toxic Substances:	Heavy alkylate naphtha (Shellsol)
CAS Numbers:	64741-65-7
Facility Identification	
Company Name:	Sandvik Materials Technology Canada
Facility Name:	Sandvik Tube Production Facility
Address:	425 McCartney Street, Arnprior, Ontario, K7S 3P3
UTM Spatial Coordinates:	UTM Easting: 394973 UTM Northing: 5031110 Map Datum: NAD83 Zone: 17
Number of Full Time Employees:	185
NPRI Identification Number:	4524
Ontario MOE ID Number:	5785
Parent Company Information	
Legal Name of the Parent Company:	Sandvik Canada Inc.
Address of the Parent Company:	2250 Meadowvale Blvd., Mississauga, ON
Percentage of Facility Owned by Company:	100%
CCRA Business Number:	121 024 244 RT0002
Primary North American Industrial Classification System Code (NAICS)	
Two Digit NAICS Code:	33
Four Digit NAICS Code:	3312
Six Digit NAICS Code:	331210

Company Contact Information

Name:	Michael Hall
Position:	General Manager
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3. TOXIC REDUCTION POLICY STATEMENT OF INTENT

Sandvik is committed to playing a leadership role in protecting the environment. Concern for the environment, health and safety is a fundamental consideration in all operations. Whenever feasible, Sandvik will eliminate, or reduce the use, creation, or discharge of toxic substances in full compliance with all federal and provincial regulations. Sandvik's employees are encouraged to participate in all types of toxic use reduction activities. Toxic use reduction will be an ongoing effort for Sandvik, and Sandvik will continue to monitor technological advancements to ensure that reduction options that are both technological and financially viable are implemented at the Facility.

4. REDUCTION OBJECTIVES

All employees at Sandvik will be involved in toxic substance use reduction. Toxic substance use and reduction of waste is a priority. Where technically and economically feasible, Sandvik's goal is to reduce toxic substance use and waste streams to the greatest extent possible. Reduction activities will include:

- Ongoing improvement of the current spill and leak prevention procedures with specific emphasis on Sandvik's toxic substance handling;
- Reduce the total amount of waste produced (waste to landfill and hazardous waste) by 3.3% by year end 2013;
- Continue with safe chemical and waste handling practices;
- Ongoing improvement to the current safe handling training.

These objectives do not have a specific timeline but undergo annual review for improvement. These objectives will be accomplished while providing a safe working environment for Sandvik's employees.

5. DESCRIPTION OF SUBSTANCE

In the manufacturing of small diameter, seamless stainless steel and high nickel alloy tubing, oil is used in the pilgering process to facilitate the reduction of ID/OD tubes to different sizes. This oil is then subsequently removed from the tubes, in various Cleaning Processes and in other workstations throughout the facility, using a sequential cleaning process with different chemicals (water, alkali solutions and solvents). Oil and residue removal is critical to prevent corrosion and maintain a high quality product.

Heavy alkylate naphtha (Shellsol) is used in the pilgering process and is added as a lubricant to coat the tubing (e.g. reduce oil accumulation). Shellsol is also used in the first step of the cleaning process for straight length and coiled tubing.

6. TOXIC SUBSTANCE REDUCTION OPTION TO BE IMPLEMENTED

The following options have been identified for implementation to reduce the use, releases and disposal of heavy alkylate naphtha:

Toxic Substance Reduction Category	Option: Identification and Description, Reduction Estimate and Proposed Timeline
Improved Inventory or Purchasing (Category 6)	<p>Ensure employees sign out the exact amount of product from “stores”. Including a tracking system to keep bottles at pre-assigned stations (i.e. prevent station bottle transfer).</p> <p>% Reduction Estimate: 10% (3.1 tonnes) Proposed Timeline: 2-3 years</p>
Training or Improved Operating Practices (Category 7)	<p>Sandvik Materials Technology Canada will implement an “Operator Awareness Program” where employees and supervisors will be trained in the environmental and health affects of Shellsol. The employees will also receive a brief awareness training on the Toxics Reduction Act.</p> <p>% Reduction Estimate: 5% (1.6 tonnes) Proposed Timeline: 2-3 years</p>



7. PLAN SUMMARY STATEMENT

This plan summary accurately reflects the content of the toxic substance reduction plan for heavy alkylate naphtha, prepared on behalf of Sandvik, dated December 18, 2013.



8. CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 18, 2013, I, Michael Hall, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their 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.

Acetone
Heavy Alkylate Naphta (HAN)

Michael Hall
General Manager
Sandvik Materials Technology Canada

17 Dec. 2013
Date

9. CERTIFICATION BY LICENSED PLANNER

As of December 18, 2013, I, Chris Bestfather certify that I am familiar with the processes at Sandvik that use or 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 plans dated December 18, 2013 and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Acetone
Heavy Alkylate Naphta

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18 Dec 2013
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