



TS Tech Trimont Mfg. Inc. (Weld Plant)

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## 2012 Toxics Reduction Plan Summary - Public Report

**Prepared For:**

TS Tech Trimont Mfg. Inc. (Weld Plant)  
210 Harry Walker Parkway North  
New Market, Ontario, L3Y, 7B4

November 25th 2013

**Prepared By:**

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# 1 Executive Summary

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The following report contains the public summary of the Toxic Substance Reduction Plans for PM-2.5 prepared for TS Tech Trimont Mfg. Inc. (Weld Plant) referred to as TS Tech (W) from here on. This plan contains all necessary elements in order to comply with the Toxic Substance Reduction Plan(s) requirements set out in Ontario Regulation 455-09 of the Ontario Toxics Reduction Act.

TS Tech Trimont Mfg. Inc. (Weld Plant) is committed to manufacturing excellent quality automotive seating hardware while complying with all applicable legal requirements.

The above mentioned seating hardware is made of tube steel frames and other hardware. The main activities that take place at the TS Tech (W) facility are:

- 1) Assembling of steel frame and hardware components to create a finished seat frame or “Seat Set”. This assembly involves welding of different frame components together to create the seat sets. Welding takes place either manually or by robots; the bulk of this welding is done by robots. One toxic substance PM 2.5 is unintentionally created and released to air from this facility as a result of welding.
- 2) Quality control inspections of manufactured seat frames or sets at various phases of assembly. These inspections are either destructive or non-destructive and are not associated with the toxic substance for which this plan was prepared.

Additionally there are heating equipment at the facility that combusts natural gas to provide comfort heat which results in the incidental creation and air release of PM-2.5.

This facility does not intend to reduce the use or creation of PM-2.5 since it is understood that they are legally not required to do so within the framework of the Toxics Reduction Act or its regulations.

Despite this, as a result of having to meet its obligations under Ontario Regulation 419 (ECA-Air), the facility will be installing particulate filters to reduce the amount of Particulate Matter (Including PM-2.5) emitted to Air. When installed, these filters will decrease the amounts of PM and PM-2.5 that is emitted to air. This plan will be updated accordingly once these filters have been installed.

## 2 Basic Facility Information

**Table 1 Facility Information**

<b>1 - Facility Information</b>	
Facility Name	TS Tech Trimont Mfg. Inc. (Weld Plant)
NPRI ID:	0000005635
2-Digit NAICS Code	33
4-Digit NAICS Code	3363
6-Digit NAICS Code	336360
Number of Full-time Employees	216
UTM Co-ordinates (NAD83)	E626060 N4881375
<b>2 - Facility Owner Information</b>	
Name	TS Tech Trimont Mfg. Inc.
Address	210 Harry Walker Parkway, Newmarket, ON, L3Y7B4
Phone Number	416-640-2045
Fax	416-847-3935
E-mail	steven_li@tstna.com ; flora_ganuelas@tstna.com
<b>3 - Facility Operator Information (if applicable)</b>	
Name	
Address	
Phone Number	
Fax	
E-mail	
<b>4 – Facility Public Contact Information</b>	
<b>Name of Public Contact</b>	Flora Ganuelas
Position	Assist. Mgr. Personnel & Admin.
Address	115 Milner Avenue, Scarborough, ON, M1S4L7
Phone Number	416-640-2045
Fax	416-847-3935
E-mail	flora_ganuelas@tstna.com
<b>5 - Parent Company Information</b>	
Legal Name of Parent Company	TS Tech Americas Inc.
Address of Parent Company	8458 E Broad St, Reynoldsburg, OH 43068, USA
Percentage of Facility Ownership	100%
CCRA Business Number	896361946
<b>6 - Toxic Substances for Which Facility Must Prepare Plan</b>	
PM2.5 - Particulate Matter <= 2.5 Microns (NPRI ID: NA-10)	

### 3 Plan Summary Intent

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This plan summary accurately reflects the content of the toxic substance reduction plan for PM-2.5 prepared by TS Tech Trimont Mfg. Inc. (Weld plant) on November 30<sup>th</sup> 2013.

### 4 Statement of Intent and Reduction Objectives

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TS Tech Trimont Mfg. Inc. (Weld Plant) is committed to manufacturing excellent quality automotive seating hardware while complying with all applicable legal requirements.

A single Toxic Substance, PM -2.5 is unintentionally created at TS Tech Trimont Mfg. Inc. due to the decomposition of welding wire and due to the combustion of natural gas fuel to provide comfort heating. All of this PM2.5 that is created in a given process is released to air. This facility does not intend to reduce the use or creation of this substance since it is understood that they are legally not required to do so within the framework of the Toxics Reduction Act or its regulations.

Despite this, as a result of having to meet its obligations under Ontario Regulation 419 (ECA-Air), the facility will be installing particulate filters to reduce the amount of Particulate Matter (Including PM-2.5) emitted to Air. When installed these filters will decrease the amounts of PM and PM-2.5 that is emitted to air. This plan will be updated accordingly once these filters have been installed.

### 5 Toxic Substance and Use

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A single Toxic Substance, PM -2.5 is unintentionally created at TS Tech Trimont Mfg. Inc. due to the decomposition of welding wire and due to the combustion of natural gas fuel to provide comfort heating. All of this PM2.5 that is created in a given process is released to air.

### 6 Description of Reduction Options to be Implemented

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At present the facility has not selected any PM-2.5 reduction options for implementation since it is understood that the facility is not legally required to select or implement any reduction options. Despite this, as a result of having to meet its obligations under Ontario Regulation 419 (ECA-Air), the facility will be installing particulate filters to reduce the amount of Particulate Matter (Including PM-2.5) emitted to Air. When installed these filters will decrease the amounts of PM and PM-2.5 that is emitted to air. This plan will be updated accordingly once these filters have been installed.

## 7 Estimated Reductions Under Options Selected

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No reductions have been estimated since the facility is not planning to reduce the creation of PM-2.5 at present.

## 8 Timelines for Achieving Estimated Reductions

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No timelines have been set since the facility is not planning to reduce the creation of PM-2.5 at present.

## 9 Copy of Certification Statement for PM-2.5

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TS Tech Trimont Mfg. Inc.  
Toxics Substance Reduction Plan for PM-2.5

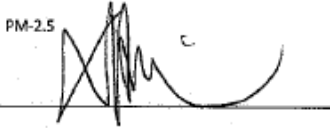
### 7 Certification for PM-2.5

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#### Certification by Highest Ranking Employee (HRE)

As of December, 5, 2013, I, Steven Li, 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.

PM-2.5



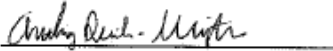
Steven Li  
President

TS Tech Trimont Mfg. Inc. (Weld Plant)

#### Certification by Licensed Planner

As of, December, 5, 2013, I, Anthony Desilva-Wijeyeratne certify that I am familiar with the processes at TS Tech Trimont Mfg. Inc. (Weld Plant) 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 25, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

PM-2.5



Anthony Desilva-Wijeyeratne  
(Planner License #TSRP0141)  
Lead Consulting Analyst and Licensed Toxic Substance  
Reduction Planner  
Envirotech Associates Ltd.