

**Ontario Toxics Reduction Act Public Report
A.G.S. Automotive Systems Cambridge Plant 2019**

Information to be made available to public

The National Pollutant Release Inventory (NPRI) identification number for the facility:

003121

The legal and trade names of the owner and the operator of the facility, the street address of the facility and, if the mailing address of the facility is different from the street address, the mailing address:

A.G.Simpson Automotive Inc. Cambridge Plant
560 Conestoga Boulevard
Cambridge, Ontario N1R 7L7

The number of full-time employee equivalents at the facility:

197

The two-and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code for the facility:

NAICS 2 Code: 33 – Metal, Computer, Appliance, Transportation, Furniture, Misc Manufacturing

NAICS 4 Code: 3328 – Coating, Engraving, Heat Treating and Allied Activities

NAICS 6 Code: 332810 – Coating, Engraving, Heat Treating and Allied Activities

NAICS 6 Code: 336370 – Motor Vehicle Metal Parts Stamping

If applicable, the name, position and telephone number of the person who is the contact at the facility for the public:

Mr. Maurice Pestowka

Position: Manager, Corporate Environmental Affairs

Phone: (519) 572-7139

Fax: (519) 621-1177

mauricep@agsautomotive.com

The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum:

UTM Zone 17, E554890 N4806102

In respect of each person who is the Canadian parent company of the facility, if applicable. The legal name of the person, the street and mailing address, if different from the address mentioned in paragraph 4, if applicable, the company's percentage of ownership of the person responsible for ensuring a toxic substance reduction plan is prepared:

A.G.Simpson Automotive Inc. (100%)

200 Yorkland Boulevard, Suite 800,

Toronto, ON M2J 5C1

A statement of whether there has been a change in the method or combination of methods used to track and quantify the substance during the previous calendar year and, if there has been a change, a description of the change, the reason for the change and how the change will impact tracking and quantification of the substances:

There has been no change in the method or combination of methods used to track and quantify Hydrochloric Acid and Manganese and its Compounds during the previous calendar year.

1. Hydrochloric acid

The name and the Chemical Abstracts Service Registry number of the substance, if a number has been assigned:

Name: Hydrochloric acid

Chemical Abstracts Service Registry number: 7647-01-0

The name of all other toxic substances used or created at the facility for which plans are required to be prepared:

Manganese (and its compounds)

On a facility-wide basis, the results of the determinations of the amount of the substance:

Hydrochloric acid is added to the DI system to regenerate the cation resin by exchanging the hydrogen with the metals on the resin. A small amount of hydrochloric acid is also used to clean equipment as well.

In 2019, hydrochloric acid was processed in plant as a reactant, a physical or chemical processing aid and a pH adjuster.

Hydrochloric acid:

	2019 Calendar Year	2018 Calendar Year	% Change	Rationale for Change (>10%)
Use	10-100 tonnes*	1-10 tonnes*	1.28%	Change in production levels
Creation	0	0	0	NA
Contained in product	0	0	0	NA
Onsite release to air	0	0	0	NA
Onsite release to water	0	0	0	NA
Onsite release to land	0	0	0	NA
Transformation	0	0	0	NA
Offsite transfer for treatment/recycling	0	0	0	NA
Destruction	14.09 tonnes	6.19 tonnes	1.28%	Change in production levels
Onsite/offsite disposal	0	0	0	NA

*Information in the range specified by the MOE director.

** Quantification values shown in this table are annual values.

This report is certified by the highest ranking employee at the facility who has management responsibilities relating to the facility.

2. Manganese (and its compounds)

The name and the Chemical Abstracts Service Registry number of the substance, if a number has been assigned:

Name: Manganese (and its compounds)

Chemical Abstracts Service Registry number: NA

The name of all other toxic substances used or created at the facility for which plans are required to be prepared:

Hydrochloric Acid (7647-01-0)

On a facility-wide basis, the results of the determinations of the amount of the substance:

Manganese contained in metal:

Metal containing manganese is received and stamped to the required specification in the Stamping Process. In the Stamping Process, scraps containing manganese are sent off-site for recycling. Welding pieces, nuts and studs are also received and transferred to the Projection Welding Process. Following stamping, metal parts are moved to spot/projection weld cells.

Manganese contained in welding pieces:

In the Spot Welding Process, metal surfaces are joined by the heat obtained from resistance to electric current. In the Projection Welding Process, the metal surfaces are joined by the heat obtained from resistance to electric current and downward force causing the heated projections on the welding pieces to collapse joining the welded pieces to the base metal.

A small quantity of Manganese is released on-site as an air emission from the Spot/Projection Welding Process, but these releases cannot be calculated due to direction given by Environment Canada not to use their published emission factors.

Manganese contained in welding wire electrode:

Welding wire electrode is received and transferred to the MIG Welding Process. In the MIG Welding Process, an electric arc forms between a consumable wire electrode and the parts, which heats the part, causing them to melt, and join. Along with the wire electrode, a shielding gas feeds through the welding gun, which shields the process from contaminants in the air. A small quantity of Manganese is released on-site as an air emission from the MIG Welding Process. After inspection, the welded parts are transferred to be packaged and shipped to the customer or for paint.

After inspection, the welded parts are transferred to paint and or package and shipping.

Manganese from zinc phosphate process:

A small quantity of Manganese is also contained in product through the zinc phosphate process.

In 2019, manganese was sent off-site contained in product and was also transferred off-site in scrap steel for recycling.

Manganese (and its compounds):

	2019 Calendar Year	2018 Calendar Year	% Change	Rationale for Change (>10%)
Use	10-100 tonnes*	1-10tonnes*	1535%	Change in raw material composition

Creation	0	0	0	NA
Contained in product	10-100 tonnes*	1-10 tonnes	1201%	Change in raw material composition
Onsite release to air	0.001 tonnes***	0.001 tonnes***	0%	NA
Onsite release to water	0	0	0	NA
Onsite release to land	0	0	0	NA
Transformation	0	0	0	NA
Offsite transfer for treatment/recycling	34.02 tonnes	1.48 tonnes	2192%	Change in raw material composition
Destruction	0	0	0	NA
Onsite/offsite disposal	0	0	0	NA

*Information in the range specified by the MOE director.

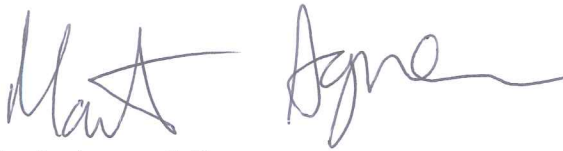
** Quantification values shown in this table are annual values.

***Releases from the non-consumable electrode welding activity cannot be calculated due to direction given by Environment Canada not to use their published emission factors.

This report is certified by the highest ranking employee at the facility who has management responsibilities relating to the facility.

Certification certified by the Highest Ranking Employee

As of July th 09, 2020, I certify that I have read the reports on the toxic substance reduction plans for hydrochloric acid and manganese (and its compounds), and am familiar with their contents and to my knowledge the information contained in the reports is factually accurate and the reports comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

A handwritten signature in black ink, appearing to read "Martin Agnew". The signature is written in a cursive style with a long horizontal stroke at the end.

Martin Agnew P.Eng
Plant Manager
A.G.S. Automotive Systems Cambridge Plant