Toxic Substance Reduction Plan Hexavalent Chromium Compounds

Summary



Blount Canada Ltd. Guelph, Ontario Last Updated on November 15, 2012

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A. Basic Facility Information

Name and CAS# of Substance	Hexavalent Chromium Compounds	N/A						
Substances for which other plans have been prepared	Hydrochloric Acid Lead Methanol	CAS 7647-01-0 CAS 67-56-1						
Facility	Facility Identification and Site Address							
Company Name	Blount Canada Ltd.,							
Facility name								
Facility Address	505 Edinburgh Road North, Guelph, Ontario, N1H 6L4							
Spatial Coordinates of Facility	Latitude: 43.3300 Longitude: 80.1600							
Number of Employees	750							
NPRI ID	3845							
Ontario MOE ID Number	N/A							
Par	rent Company Information							
Name and Address	Blount International	4909 S.E. International Way, Portland Oregon USA						
Percent Ownership	100%							
Business Number	58638040							
Primary North America	n Industrial Classification System Co	de (NAICS)						
2 Digit NAICS Code	33							

Blount Canada Ltd. Pag Guelph, Ontario Last Updated on November 15, 2012

4 Digit NAICS Code	3328					
6 Digit NAICS Code	332810					
Cor	npany Contact Information					
Facility Public Contact	Edward Lebrun, General Manager	505 Edinburgh Road North, Guelph, Ontario, N1H 6L4				
	ted.lebrun@blount.ca					
	Phone: 519-822-6870					
	Fax: 519-822-1450					
Parent Company Contact Information						
Parent Company Contact	N/A					

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for hexavalent chromium compounds, prepared by Blount Canada Ltd., dated December 12, 2012.

STATEMENT OF INTENT

Blount Canada Ltd. is committed to playing a leadership role in protecting the environment. Whenever feasible, we will eliminate, or reduce the use and discharge of hexavalent chromium compounds in full compliance with all Federal and Provincial Regulations. This facility does not create hexavalent chromium compounds, therefore this plan will not address reducing its creation.

REDUCTION OBJECTIVES

Blount intends to monitor new methods and investigate ways to reduce or eliminate the use of hexavalent chromium. Our objective is to reduce use of chrome by 5% within the next 6 years of preparing this Plan.

DESCRIPTION OF SUBSTANCE

Hexavalent Chromium Compounds - used in manufacturing process of chain cutters

TOXIC SUBSTANCE REDUCTION OPTION TO BE IMPLEMENTED

The following options have been identified for implementation to reduce the use and releases of hexavalent chromium compounds:

- Improve operation and controls on chrome purification system to maintain quality of the plating bath and eliminate the need for "half-dumps".
- Ensure that empty totes are fully drained before returning them to the liquid chrome supplier.
- Revise the Standard Operating Procedures for the Hard Chrome Plating process in order to reduce Cr (VI) air emissions. Monitor tanks to detect and eliminate drips.

Anticipated Reductions from the implementation of the above listed options are as follows:

Company Name: Blount Canada Ltd.

Substance: hexavalent chromium compounds

CAS#: NA

Reduction Option: **Equipment or process modification - improvements in operation and controls on chrome purification system**

	Used				On-site Releases (kg/yr)			Disposal (kg/yr)		Contained in Product
	(kg/yr)		Air	Water	Land	On-site	Off-site	(kg/yr)	(kg/yr)	
Baseline	11,220	0.0	2	0.0	0.0	0.0	9,459	0.0	0.0	
New estimated amount	9,204	0.0	2	0.0	0.0	0.0	7,443	0.0	0.0	
Reduction	2,016	0.0	0.0	0.0	0.0	0.0	2,016	0.0	0.0	
%Reduction	18%	0%	0%	0%	0%	0%	21%	0%	0%	

Blount Canada Ltd. Page Guelph, Ontario Last Updated on November 15, 2012

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Toxic Substance Reduction Plan for 2011

Company Name: Blount Canada Ltd.

Substance: hexavalent chromium compounds

CAS#: NA

Reduction Option: **Improved inventory or purchasing - Ensure that empty totes are fully drained before returning them to the liquid chrome supplier.**

			On-site	On-site Releases (kg/yr)			Disposal (kg/yr)		Contained in Product
	(kg/yr)	(kg/yr)	Air	Water	Land	On-site	Off-site	(kg/yr)	(kg/yr)
Baseline	11,220	0.0	2	0.0	0.0	0.0	9,459	0.0	0.0
New estimated amount	8,820	0.0	2	0.0	0.0	0.0	7,059	0.0	0.0
Reduction	2,400	0.0	0.0	0.0	0.0	0.0	2,400	0.0	0.0
%Reduction	25%	0%	0%	0%	0%	0%	35%	0%	0%

Company Name: Blount Canada Ltd.

Substance: hexavalent chromium compounds

CAS#: NA

Reduction Option: Training or improved operating practices - Revise the Standard Operating Procedures for the Hard Chrome Plating process in order to reduce Cr (VI) air emissions. Monitor tanks to detect and eliminate drips.

	Used		On-site	On-site Releases (kg/yr)			Disposal (kg/yr)		Contained in Product
	(kg/yr)	(kg/yr)	Air	Water	Land	On-site	Off-site	(kg/yr)	(kg/yr)
Baseline	11,220	0.0	2	0.0	0.0	0.0	9,459	0.0	0.0
New estimated amount	11,108	0.0	2	0.0	0.0	0.0	9,459	0.0	0.0

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Toxic Substance Reduction Plan for 2011

Reduction	112	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%Reduction	1%	0%	0%	0%	0%	0%	0%	0%	0%

It is expected that these reductions will be achieved within one to two years.

Toxic Substance Reduction Plan Hydrochloric Acid

Summary



Blount Canada Ltd. Guelph, Ontario Last Updated on November 15, 2012

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Name and CAS# of Substance	Hydrochloric Acid	CAS 7647-01-0
Substances for which other	Hexavalent Chromium Compounds	N/A
plans have been prepared	Lead	N/A
	Methanol	CAS 67-56-1
Facility	Identification and Site Address	
Company Name	Blount Canada Ltd.,	
Facility name		
Facility Address	505 Edinburgh Road North, Guelph, Ontario, N1H 6L4	
Spatial Coordinates of Facility	Latitude: 43.3300	
	Longitude: 80.1600	
Number of Employees	750	
NPRI ID	3845	
Ontario MOE ID Number	N/A	
Pa	rent Company Information	
Name and Address	Blount International	4909 S.E. International Way, Portland Oregon USA
Percent Ownership	100%	
Business Number	58638040	
Primary North America	n Industrial Classification System Co	de (NAICS)
2 Digit NAICS Code	33	
4 Digit NAICS Code	3328	

B. Basic Facility Information

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6 Digit NAICS Code	332810					
Cor	npany Contact Information					
Facility Public Contact	Edward Lebrun, General Manager	505 Edinburgh Road North, Guelph, Ontario, N1H 6L4				
	ted.lebrun@blount.ca					
	Phone: 519-822-6870					
	Fax: 519-822-1450					
Parent Company Contact Information						
Parent Company Contact	N/A					

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for hydrochloric acid, prepared by Blount Canada Ltd., dated December 12, 2012.

STATEMENT OF INTENT

Blount Canada Ltd. is committed to playing a leadership role in protecting the environment. Hydrochloric acid is currently used by Blount as a manufacturing aid in regeneration of ion exchangers in process of de-ionized water treatment, pH adjustment and cleaning. We intend to reduce or eliminate the use of this toxic substance at the facility. This facility does not create hydrochloric acid, therefore this plan will not address reducing its creation. Whenever feasible, we intend to reduce or eliminate the use of this toxic substance at the facility in full compliance with all Federal and Provincial Regulations.

REDUCTION OBJECTIVES

In 2011 Blount completely eliminated use of hydrochloric acid in manufacturing process and significantly reduced use in ancillary processes. Blount will strive to reduce the use of hydrochloric acid at the facility. Blount intends to reduce the use of hydrochloric acid by 10% over the next 5 years of preparing this Plan.

Blount Canada Ltd. Page 3 of 19 Guelph, Ontario Last Updated on November 15, 2012

DESCRIPTION OF SUBSTANCE

Hydrochloric acid is currently used by Blount as a manufacturing aid in regeneration of ion exchangers in process of de-ionized water treatment, pH adjustment and cleaning. This facility does not create hydrochloric acid; therefore this plan will not address reducing its creation.

TOXIC SUBSTANCE REDUCTION OPTION TO BE IMPLEMENTED

The following option has been identified for implementation to reduce the use and releases of hydrochloric acid:

• Review and Revise the Standard Operating Procedures for staff operating DI water treatment system in Waste Treatment Facility.

Anticipated Reductions from the implementation of the above listed options are as follows:

Company Name: Blount Canada Ltd.

Substance: hydrochloric acid

CAS#: 67-56-1

Reduction Option: Training or improved operating practices – Review and Revise the Standard Operating Procedures for staff operating DI water treatment system in Waste Treatment Facility.

	Used Created	On-sit	On-site Releases (t/yr)			Disposal (t/yr)		Contained in Product	
	(t/yr)	(t/yr)	Air	Water	Land	On-site	Off-site	(t/yr)	(t/yr)
Baseline	25.856	0.0	0.363	0.0	0.0	0.0	1.395	0.0	0.0
New estimated amount	25.830	0.0	0.00	0.0	0.0	0.0	1.395	0.0	0.0
Reduction	0.026	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%Reduction	0.1%	0%	0%	0%	0%	0%	0%	0%	0%

It is expected that these reductions will be achieved within five years.

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Toxic Substance Reduction Plan Lead

Summary



Blount Canada Ltd. F Guelph, Ontario Last Updated on November 15, 2012

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C. Basic Facility Information

Name and CAS# of Substance	Lead	N/A							
Substances for which other	Hydrochloric Acid	CAS 7647-01-0							
plans have been prepared	Methanol	CAS 67-56-1							
	Hexavalent Chromium Compounds	N/A							
Facility	Facility Identification and Site Address								
Company Name	Blount Canada Ltd.,								
Facility name									
Facility Address	505 Edinburgh Road North, Guelph, Ontario, N1H 6L4								
Spatial Coordinates of Facility	Latitude: 43.3300								
	Longitude: 80.1600								
Number of Employees	750								
NPRI ID	3845								
Ontario MOE ID Number	N/A								
Pa	rent Company Information								
Name and Address	Blount International	4909 S.E. International Way, Portland Oregon USA							
Percent Ownership	100%								
Business Number	58638040								
Primary North American	n Industrial Classification System Coo	de (NAICS)							
2 Digit NAICS Code	33								

Blount Canada Ltd. Pag Guelph, Ontario Last Updated on November 15, 2012

4 Digit NAICS Code	3328					
6 Digit NAICS Code	332810					
Cor	npany Contact Information					
Facility Public Contact	Edward Lebrun, General Manager	505 Edinburgh Road North, Guelph, Ontario, N1H 6L4				
	ted.lebrun@blount.ca					
	Phone: 519-822-6870					
	Fax: 519-822-1450					
Parent Company Contact Information						
Parent Company Contact	N/A					

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for lead, prepared by Blount Canada Ltd., dated December 12, 2012.

STATEMENT OF INTENT

Blount Canada Ltd. is committed to playing a leadership role in protecting the environment. Lead is currently used by Blount as a manufacturing aid in cutter manufacturing process. This facility does not create lead; therefore this plan will not address reducing its creation. Whenever feasible, we will eliminate, or reduce the use and discharge of lead in full compliance with all Federal and Provincial Regulations.

REDUCTION OBJECTIVES

Blount intends to monitor new methods and investigate ways to reduce or eliminate the use of lead. Blount intends to reduce the use of lead by 7 per cent within the next five to six years of preparing this Plan.

DESCRIPTION OF SUBSTANCE

Lead is currently used by Blount as a manufacturing aid in cutter manufacturing process. This facility does not create lead, therefore this plan will not address reducing its creation.

TOXIC SUBSTANCE REDUCTION OPTION TO BE IMPLEMENTED

The following options have been identified for implementation to reduce the use and releases of lead:

- Improve operation and controls on chrome purification system to maintain quality of the plating bath and reduce consumption of materials.
- Revise the Standard Operating Procedures for the Hard Chrome Plating process and chrome purification.

Anticipated Reductions from the implementation of the above listed options are as follows:

Company Name: Blount Canada Ltd.

Substance: lead

CAS#: NA

Reduction Option: Equipment or process modification – Improvements in operation and control of chrome purification system to maintain quality of the plating bath and reduce consumption of materials.

	Used	Used Created (kg/yr) (kg/yr)	On-site	On-site Releases (kg/yr)			Disposal (kg/yr)		Contained in Product
	(Kg/yI)		Air	Water	Land	On-site	Off-site	(kg/yr)	(kg/yr)
Baseline	3,758	0.0	2	0.0	0.0	0.0	2,100	0.0	0.0
New estimated amount	3,494	0.0	2	0.0	0.0	0.0	1,836	0.0	0.0
Reduction	264	0.0	0.0	0.0	0.0	0.0	264	0.0	0.0
%Reduction	7%	0%	0%	0%	0%	0%	12%	0%	0%

Company Name: Blount Canada Ltd.

Blount Canada Ltd. Page 8 of 19 Guelph, Ontario Last Updated on November 15, 2012 Substance: lead

CAS#: NA

Reduction Option: Training or improved operating practices - Revise the Standard Operating Procedures for the Hard Chrome Plating process and chrome purification.

	Used (kg/yr)	Created (kg/yr)	On-site Releases (kg/yr)			Disposal (kg/yr)		Transfer	Contained
			Air	Water	Land	On-site	Off-site	(kg/yr)	in Product (kg/yr)
Baseline	3,758	0.0	0.002	0.0	0.0	0.0	2,100	0.0	0.0
New estimated amount	3,494	0.0	0.002	0.0	0.0	0.0	1,836	0.0	0.0
Reduction	264	0.0	0.0	0.0	0.0	0.0	264	0.0	0.0
%Reduction	7%	0%	0%	0%	0%	0%	12.6%	0%	0%

It is expected that these reductions will be achieved within five to six years.

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Toxic Substance Reduction Plan Methanol

Summary



Blount Canada Ltd. H Guelph, Ontario Last Updated on November 15, 2012

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Name and CAS# of Substance	Methanol	CAS 67-56-1			
Substances for which other plans have been prepared	Hydrochloric Acid Hexavalent Chromium Compounds Lead	CAS 7647-01-0 N/A N/A			
Facility	Identification and Site Address				
Company Name	Blount Canada Ltd.,	Ltd.,			
Facility name					
Facility Address	505 Edinburgh Road North, Guelph, Ontario, N1H 6L4				
Spatial Coordinates of Facility	Latitude: 43.3300 Longitude: 80.1600				
Number of Employees	750				
NPRI ID	3845				
Ontario MOE ID Number	N/A				
Pa	rent Company Information				
Name and Address	Blount International	4909 S.E. International Way, Portland Oregon USA			
Percent Ownership	100%				
Business Number	58638040				
Primary North America	n Industrial Classification System Co	de (NAICS)			
2 Digit NAICS Code	33				
4 Digit NAICS Code	3328				

D. Basic Facility Information

Blount Canada Ltd. Page Guelph, Ontario Last Updated on November 15, 2012

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6 Digit NAICS Code	332810					
Company Contact Information						
Facility Public Contact	Edward Lebrun, General Manager	505 Edinburgh Road North, Guelph, Ontario, N1H 6L4				
	ted.lebrun@blount.ca					
	Phone: 519-822-6870					
	Fax: 519-822-1450					
Parent Company Contact Information						
Parent Company Contact	N/A					

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for methanol, prepared by Blount Canada Ltd., dated December 12, 2012.

STATEMENT OF INTENT

Blount Canada Ltd. is committed to playing a leadership role in protecting the environment. Methanol is currently used by Blount as a manufacturing aid in heat treatment process. This facility does not create methanol; therefore this plan will not address reducing its creation. Whenever feasible, we intend to reduce or eliminate the use of this toxic substance at the facility in full compliance with all Federal and Provincial Regulations.

REDUCTION OBJECTIVES

Blount intends to monitor new methods and investigate ways to reduce or eliminate the use of lead. Blount intends to reduce the use of methanol by 1% over the next 5 years of preparing this Plan.

DESCRIPTION OF SUBSTANCE

Methanol is used in Blount as a manufacturing aid in parts heat treatment process. This facility does not create methanol; therefore this plan will not address reducing its creation.

Blount Canada Ltd. Page 12 of 19 Guelph, Ontario Last Updated on November 15, 2012

TOXIC SUBSTANCE REDUCTION OPTION TO BE IMPLEMENTED

The following option has been identified for implementation to reduce the use and releases of methanol:

• Review and revise Standard Operating Procedures (SOP) for staff operating heat treatment equipment using methanol.

Anticipated Reductions from the implementation of the above listed options are as follows:

Company Name: Blount Canada Ltd.

Substance: methanol

CAS#: 67-56-1

Reduction Option: **Training or improved operating practices – Review and revise Standard Operating Procedures (SOP) for staff operating heat treatment equipment using methanol.**

	Used (t/yr)	Created (t/yr)	On-site Releases (t/yr)			Disposal (t/yr)		Transfer	Contained in Product
			Air	Water	Land	On-site	Off-site	(t/yr)	(t/yr)
Baseline	247.800	0.0	0.62	0.0	0.0	0.0	0.406	0.0	0.0
New estimated amount	245.322	0.0	0.00	0.0	0.0	0.0	0.406	0.0	0.0
Reduction	2.478	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%Reduction	1%	0%	0%	0%	0%	0%	0%	0%	0%

It is expected that these reductions will be achieved within five years.

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7. Planner Recommendations and Rationale

The planner's recommendations and rationale for those recommendations are appended to the plan.

8. Plan Certifications for Hexavalent Chromium

As of December 12, 2012, I, Edward Lebrun, 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

(Hexavalent Chromium)

Date

Edward Lebrun General Manager, Blount Canada Ltd. (Highest Ranking Employee)

As of December 12, 2012, I, Les Kuczynski certify that I am familiar with the processes at Blount Canada Ltd 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 30, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

(Hexavalent Chromium)

Nov 15

Les Kuczynski P.Eng. Toxic Substance Reduction Planner License #TSRP0093 Date

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Blount Canada Ltd. Guelph, Ontario Last Updated on October 24, 2012

8. Plan Certifications for Hydrochloric Acid

As of December 12, 2012, I, Edward Lebrun, 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

(Hydrochloric Acid)

Date

Edward Lebrun General Manager, Blount Canada Ltd. (Highest Ranking Employee)

As of December 12, 2012, I, Les Kuczynski certify that I am familiar with the processes at Blount Canada Ltd 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 30, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

(Hydrochloric Acid)

Magynohi

Nov 5, 2012

Date

Les Kuczynski P.Eng. Toxic Substance Reduction Planner License #TSRP0093

Blount Canada Ltd. Pag Guelph, Ontario Last Updated on November 15, 2012

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8. Plan Certifications for Lead

As of December 12, 2012, I, Edward Lebrun, 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

(Lead)

Date

Edward Lebrun General Manager, Blount Canada Ltd. (Highest Ranking Employee)

As of December 12, 2012, I, Les Kuczynski certify that I am familiar with the processes at Blount Canada Ltd 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 30, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

(Lead)

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Nas 15,2012

Les Kuczynski P. Eng. Toxic Substance Reduction Planner License #TSRP0093

Date

Blount Canada Ltd. *Guelph*, *Ontario* Last Updated on November 6, 2012

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8. Plan Certifications for Methanol

As of December 12, 2012, I, Edward Lebrun, 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

(Methanol)

Edward Lebrun General Manager, Blount Canada Ltd. (Highest Ranking Employee) Date

As of December 12, 2012, I, Les Kuczynski certify that I am familiar with the processes at Blount Canada Ltd 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 30, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

(Methanol)

WALL 3

Les Kuczynski P.Eng. Toxic Substance Reduction Planner License #TSRP0093 Nov 15, 2012

Date

Blount Canada Ltd. Page 37 of 37 Guelph, Ontario Last Updated on November 15, 2012