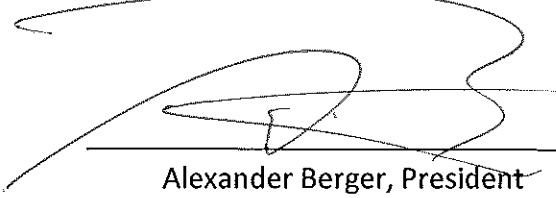


As of May 29, 2018, I, Alexander Berger, certify that I have read the toxic substance reduction plan for VOCs (hydrotreated heavy naphtha and Stoddard solvent) and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.



Alexander Berger, President

May 29th, 2018
Date

National Pollutant Release Inventory (NPRI) and Partners



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Report Preview

Report Details

Report Year	2017
Report Type:	NPRI,ON MOE TRA
Report Status:	Ready to Submit
Modified Date/Time:	14/05/2018 4:07 PM

Company and Facility Details

Company Name:	A. Berger Precision Ltd.
Business Number:	100013374
Mailing Address:	Delivery Mode: SuburbanServices Address Line 1: 28 Regan Road City, Province/Territory, Postal Code: Brampton Ontario L7A1A7 Country: Canada
Facility Name:	REGAN ROAD FACILITY
NAICS Code:	332720
NPRI ID:	10623
Physical Address:	Address Line 1: 28 Regan Road City, Province/Territory, Postal Code: Brampton Ontario L7A1A7 Country: Canada Latitude: 43.7036 Longitude: -79.8063 UTM Zone: 17 UTM Easting: 596220 UTM Northing: 4839679

Contacts Details

Contact Type	Technical Contact, Contractor Contact, Person who prepared the report, Person who coordinated the preparation of the Toxics Reduction Plan
Name:	Wendy Nadan
Position:	Principal
Telephone:	5199404724
Email:	wendy@nadanconsulting.com
Independent contractor/consultant company name:	Nadan Consulting Ltd
Contact Type	Certifying Official, Highest Ranking Employee
Name:	Alexander Berger
Position:	President
Telephone:	9058404207

Extension: 8000

Email: alexander.berger@aberger.com

Contact Type: Company Coordinator

Name: Mike Fyfe

Position: EHS Manager

Telephone: 9057996258

Extension: 2193

Fax: 9058408022

Email: mike.fyfe@aberger.com

Contact Type: Public Contact

Name: Mike Fyfe

Position: EHA Manager

Telephone: 9058404207

Email: mike.fyfe@aberger.com

General Information

Number of employees: 188

Activities for Which the 20,000-Hour Employee Threshold Does Not Apply: None of the above

Activities Relevant to Reporting of Dioxins, Furans and Hexachlorobenzene: None of the above

Activities Relevant to Reporting of Polycyclic Aromatic Hydrocarbons (PAHs): Wood preservation using creosote: No

Is this the first time the facility is reporting to the NPRI (under current or past ownership): No

Is the facility controlled by another Canadian company or companies: No

Did the facility report under other environmental regulations or permits: No

Is the facility required to report one or more NPRI Part 4 substances (Criteria Air Contaminants): Yes

Was the facility shut down for more than one week during the year: No

Operating Schedule - Days of the Week: Mon, Tue, Wed, Thu, Fri

Usual Number of Operating Hours per day: 24

Usual Daily Start Time (24h) (hh:mm): 00:00

Substance List

CAS RN	Substance Name	Releases	Releases (Speciated VOCs)	Disposals	Recycling	Unit
NA - 04	Chromium (and its compounds)	N/A	N/A	N/A	20.8780	tonnes
NA - 09	Manganese (and its compounds)	N/A	N/A	N/A	1.9630	tonnes
NA - 11	Nickel (and its compounds)	N/A	N/A	N/A	4.8690	tonnes
NA - M09	PM10 - Particulate Matter <= 10 Microns	0.0150	N/A	N/A	N/A	tonnes
NA - M16	Volatile Organic Compounds (VOCs)	13.0350	12.1370	N/A	N/A	tonnes

Applicable Programs

CAS RN	Substance Name	NPRI	ON MOE TRA	ON MOE Reg 127/01	First report for this substance to the ON MOE TRA

CAS RN	Substance Name	NPRI	ON MOE TRA	ON MOE Reg 127/01	First report for this substance to the ON MOE TRA
NA - 04	Chromium (and its compounds)	Yes	Yes		Yes
NA - 09	Manganese (and its compounds)	No	No		No
NA - 11	Nickel (and its compounds)	Yes	Yes		Yes
NA - M09	PM10 - Particulate Matter <= 10 Microns	No	No		No
NA - M16	Volatile Organic Compounds (VOCs)	Yes	Yes		Yes

TRA Exit Record

CAS RN	Substance Name	Circumstance(s) that apply	Describe the circumstances that lead to the criteria no longer being met	Describe the information and any quantifications relied upon for making the determination
NA - 09	Manganese (and its compounds)	The substance did not meet the criteria to provide information to NPRI	usage does not meet threshold	composition of metal grades used and annual usage
NA - M09	PM10 - Particulate Matter <= 10 Microns	The substance did not meet the criteria to provide information to NPRI	a major source of particulate matter has been eliminated	new equipment installed

General Information about the Substance - Releases and Transfers of the Substance

CAS RN	Substance Name	Was the substance released on-site	The substance will be reported as the sum of releases to all media (total of 1 tonne or less)	1 tonne or more of a Part 5 Substance (Speciated VOC) was released to air
NA - 04	Chromium (and its compounds)	No	No	No
NA - 09	Manganese (and its compounds)	No	No	No
NA - 11	Nickel (and its compounds)	No	No	No
NA - M16	Volatile Organic Compounds (VOCs)		No	Yes

General Information about the Substance - Disposals and Off-site Transfers for Recycling

CAS RN	Substance Name	Was the substance disposed of (on-site or off-site), or transferred for treatment prior to final disposal	Is the facility required to report on disposals of tailings and waste rock for the selected reporting period	Was the substance transferred off-site for recycling
NA - 04	Chromium (and its compounds)	No	No	Yes
NA - 09	Manganese (and its compounds)	No	No	Yes
NA - 11	Nickel (and its compounds)	No	No	Yes
NA - M16	Volatile Organic Compounds (VOCs)			

General Information about the Substance - Nature of Activities

CAS RN	Substance Name	Manufacture the Substance	Process the Substance	Otherwise Use of the Substance
NA - 04	Chromium (and its compounds)		As a formulation component	
NA - 09	Manganese (and its compounds)		As a formulation component	
NA - 11	Nickel (and its compounds)		As a formulation component	
NA - M16	Volatile Organic Compounds (VOCs)			

Substances added to/removed from the report

CAS RN	Substance Name	Added/Removed	Comment
NA - 04	Chromium (and its compounds)	Added	usage exceeded reporting threshold
NA - 11	Nickel (and its compounds)	Added	usage exceeded reporting threshold

TRA Quantifications

CAS RN	Substance Name	Use, Creation, Contained in Product	Quantity	Use ranges for public reporting
NA - 04	Chromium (and its compounds)	Use	50.054 tonnes	Yes
NA - 04	Chromium (and its compounds)	Creation	0 tonnes	No
NA - 04	Chromium (and its compounds)	Contained in Product	29.176 tonnes	Yes
NA - 11	Nickel (and its compounds)	Use	11.674 tonnes	Yes
NA - 11	Nickel (and its compounds)	Creation	0 tonnes	No
NA - 11	Nickel (and its compounds)	Contained in Product	6.805 tonnes	Yes
NA - M16	Volatile Organic Compounds (VOCs)	Use	14.671 tonnes	No

CAS RN	Substance Name	Use, Creation, Contained in Product	Quantity	Use ranges for public reporting
NA - M16	Volatile Organic Compounds (VOCs)	Creation	0 tonnes	No
NA - M16	Volatile Organic Compounds (VOCs)	Contained in Product		

TRA Quantifications - VOC Breakdown List

CAS RN	Substance Name	Use, Creation, Contained in Product	Quantity
64742-48-9	Hydrotreated heavy naphtha	Use	11.424 tonnes
64742-48-9	Hydrotreated heavy naphtha	Creation	0 tonnes
8052-41-3	Stoddard solvent	Use	1.541 tonnes
8052-41-3	Stoddard solvent	Creation	0 tonnes

TRA Quantifications - Total Speciated VOCs

Use, Creation, Contained in Product	Quantity
Use	12.965 tonnes
Creation	0 tonnes

TRA Quantifications - Others

CAS RN	Substance Name	Change in Method of Quantification	Reasons for Change	Description of how the change impact tracking and quantification of the substance	Description of how an incident(s) affected quantifications	Significant Process Change
NA - 04	Chromium (and its compounds)					No
NA - 11	Nickel (and its compounds)					No
NA - M16	Volatile Organic Compounds (VOCs)					No

On-site Releases - Releases to air

CAS RN	Substance Name	Category	Basis of Estimate	Detail Code	Quantity
NA - M09	PM10 - Particulate Matter <= 10 Microns	Fugitive Releases	O - Engineering Estimates		0.015 tonnes
NA - M16	Volatile Organic Compounds (VOCs)	Stack or Point Releases	C - Mass Balance		1.954 tonnes
NA - M16	Volatile Organic Compounds (VOCs)	Fugitive Releases	C - Mass Balance		11.081 tonnes
NA - M16	Volatile Organic Compounds (VOCs)	Other Sources - Speciated VOCs	NA - Not Applicable		13.035 tonnes

On-site Releases - Releases to air - Total

CAS RN	Substance Name	Total - Releases to Air
NA - M09	PM10 - Particulate Matter <= 10 Microns	0.015 tonnes
NA - M16	Volatile Organic Compounds (VOCs)	13.035 tonnes

On-site Releases - Releases to air - VOC Breakdown List

Category	CAS RN	Substance Name	Quantity
Other Sources - Speciated VOCs	64742-48-9	Hydrotreated heavy naphtha	10.596 tonnes
Other Sources - Speciated VOCs	8052-41-3	Stoddard solvent	1.541 tonnes

On-site Releases - Monthly Breakdown of Annual Releases

CAS RN	Substance Name	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
NA - M09	PM10 - Particulate Matter <= 10 Microns	8.33	8.33	8.34	8.33	8.33	8.34	8.33	8.33	8.34	8.33	8.33	8.34
NA - M16	Volatile Organic Compounds (VOCs)	8.33	8.33	8.34	8.33	8.33	8.34	8.33	8.33	8.34	8.33	8.33	8.34

On-site Releases - Reasons for Changes in Quantities Released from Previous Year

CAS RN	Substance Name	Reasons for Changes in Quantities from Previous Year	Comments
NA - 04	Chromium (and its compounds)	Changes in estimation methods	
NA - 09	Manganese (and its compounds)	Other (specify in On-site Releases comment field)	natural variation in metal category used
NA - 11	Nickel (and its compounds)	Not applicable (first year reporting this substance)	
NA - M09	PM10 - Particulate Matter <= 10 Microns	Pollution prevention activities	
NA - M16	Volatile Organic Compounds (VOCs)	Changes in production levels	

Disposals - Reasons and Comments

CAS RN	Substance Name	Reasons Why Substance Was Disposed	Reasons for Changes in Quantities from Previous Year	Comments
NA - 04	Chromium (and its compounds)		Changes in estimation methods	
NA - 09	Manganese (and its compounds)		Other (specify in On-site Releases comment field)	natural variation in metal category used
NA - 11	Nickel (and its compounds)		Not applicable (first year reporting this substance)	

Recycling - Off-site Transfers for Recycling

CAS RN	Substance Name	Category	Basis of Estimate	Detail Code	Quantity
NA - 04	Chromium (and its compounds)	Recovery of Metals and Metal Compounds	C - Mass Balance		20.878 tonnes
NA - 09	Manganese (and its compounds)	Recovery of Metals and Metal Compounds	C - Mass Balance		1.963 tonnes
NA - 11	Nickel (and its compounds)	Recovery of Metals and Metal Compounds	C - Mass Balance		4.869 tonnes

Recycling - Off-site Transfers for Recycling - Total

CAS RN	Substance Name	Total - Off-site Transfers for Recycling
NA - 04	Chromium (and its compounds)	20.878 tonnes
NA - 09	Manganese (and its compounds)	1.963 tonnes
NA - 11	Nickel (and its compounds)	4.869 tonnes

Recycling - Off-site Transfers for Recycling - By Facility

CAS RN	Substance Name	Category	Off-site Name	Off-site Address	Quantity
NA - 04	Chromium (and its compounds)	Recovery of Metals and Metal Compounds	Waxman Recycling Industries	20 Hyde Ave., Toronto, ON, Canada	20.878 tonnes
NA - 09	Manganese (and its compounds)	Recovery of Metals and Metal Compounds	Waxman Recycling Industries	20 Hyde Ave., Toronto, ON, Canada	1.963 tonnes
NA - 11	Nickel (and its compounds)	Recovery of Metals and Metal Compounds	Waxman Recycling Industries	20 Hyde Ave., Toronto, ON, Canada	4.869 tonnes

Recycling - Reasons and Comments

CAS RN	Substance Name	Reasons Why Substance Was Recycled	Reasons for Changes in Quantities Recycled from Previous Year	Comments
NA - 04	Chromium (and its compounds)	Unusable parts or discards	Changes in estimation methods	
NA - 09	Manganese (and its compounds)	Machine or finishing residues	Changes in production levels	
NA - 11	Nickel (and its compounds)	Unusable parts or discards	Not applicable (first year reporting this substance)	

Pollution Prevention

Does the facility have a documented pollution prevention plan?

Yes

a) Please check all that apply

Plan was prepared or implemented for another government jurisdiction (i.e. other Federal government department, province, municipality). Specify name in comments field below.

b) Did the facility update their plan in the current reporting year?

No

c) Does the plan address substances, energy conservation, or water conservation?

Substances (provide the name of the primary Substances in the comments field below)

Please summarize your pollution prevention plan. If you selected "Substances", please specify the substances that were addressed in your plan (this information will be publicly available).

Ontario TRA

Did the facility complete any pollution prevention activities in the current NPRI reporting year

No

Progress on TRA Plan - Objectives

CAS RN	Substance Name	Objectives
64742-48-9	Hydrotreated heavy naphtha	A.Berger has prepared this toxic substance reduction plan for VOCs to investigate options to reduce the usage of VOCs while supplying customers with products that meet their needs.
8052-41-3	Stoddard solvent	A.Berger has prepared this toxic substance reduction plan for VOCs to investigate options to reduce the usage of VOCs while supplying customers with products that meet their needs. The facility plans to reduce usage of Stoddard Solvent CAS# 8052-41-3 by 75% in 2014.

Progress on TRA Plan - Use Targets

CAS RN	Substance Name	Quantity	Years	Description of Target
64742-48-9	Hydrotreated heavy naphtha	0 kg	No timeline target	
8052-41-3	Stoddard solvent	4800 kg	1	Degreasing bins at machines will be replaced by the end of the second quarter 2013 with smaller bins equipped with lids.

Progress on TRA Plan - Creation Targets

CAS RN	Substance Name	Quantity	Years	Description of Target
64742-48-9	Hydrotreated heavy naphtha	No quantity target	No timeline target	
8052-41-3	Stoddard solvent	No quantity target	No timeline target	

Progress on TRA Plan - Toxic Reduction Options Implemented

CAS RN	Substance Name	Activity	Steps that were taken in the reporting period to implement the toxic reduction option	Public summary of the description of the steps	Comparison of the steps that were described in the plan for implementation with the actual steps taken during the reporting period	Public summary of the comparison of the steps
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	employees have been trained to keep containers closed	employees have been trained to keep containers closed	employees have been trained to keep containers closed as per plan	employees have been trained to keep containers closed as per plan
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	none	none	no steps were required	no steps were required

CAS RN	Substance Name	Activity	Will the timelines in the current version of the plan will be met	Comments:
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	Yes	
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	Yes	

Progress on TRA Plan - Reductions due to Options Implemented - Equipment or process modifications

CAS RN	Substance Name	Activity	Reductions due to Options Implemented	Quantity
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the steps described:	No Amount
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to steps described:	No Amount
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
8052-41-3	Stoddard solvent	Modified equipment, layout or piping	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the steps described:	No Amount

Progress on TRA Plan - Reductions due to Options Implemented - Good operator practice or training

CAS RN	Substance Name	Activity	Reductions due to Options Implemented	Quantity
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the steps described:	No Amount

CAS RN	Substance Name	Activity	Reductions due to Options Implemented	Quantity
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to steps described:	No Amount
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the steps described:	No Amount
64742-48-9	Hydrotreated heavy naphtha	Training related to toxics substance reduction	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the steps described:	No Amount

Progress on TRA Plan - Additional Actions

CAS RN	Substance Name	Were there any additional actions outside the plan taken during the reporting period to reduce the use and/or creation of the substance?	Describe any additional actions that were taken during the reporting period to achieve the plan's objectives	Provide a public summary of the description of the additional action taken
64742-48-9	Hydrotreated heavy naphtha	No		
8052-41-3	Stoddard solvent	No		

Progress on TRA Plan - Reductions due to additional actions taken

CAS RN	Substance Name	Reductions due to additional actions taken	Quantity
64742-48-9	Hydrotreated heavy naphtha	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the additional actions.	
64742-48-9	Hydrotreated heavy naphtha	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the additional actions.	
64742-48-9	Hydrotreated heavy naphtha	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the additional actions.	
64742-48-9	Hydrotreated heavy naphtha	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the additional actions.	
64742-48-9	Hydrotreated heavy naphtha	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the additional actions.	
64742-48-9	Hydrotreated heavy naphtha	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to additional actions.	
64742-48-9	Hydrotreated heavy naphtha	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
64742-48-9	Hydrotreated heavy naphtha	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
64742-48-9	Hydrotreated heavy naphtha	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the additional actions.	
8052-41-3	Stoddard solvent	The amount of reduction in use of the substance at the facility during the reporting period that resulted due to the additional actions.	
8052-41-3	Stoddard solvent	The amount of reduction in creation of the substance at the facility during the reporting period that resulted due to the additional actions.	
8052-41-3	Stoddard solvent	The amount of reduction in the substance contained in product at the facility during the reporting period that resulted due to the additional actions.	
8052-41-3	Stoddard solvent	The amount of reduction in release to air of the substance at the facility during the reporting period that resulted due to the additional actions.	
8052-41-3	Stoddard solvent	The amount of reduction in release to water of the substance at the facility during the reporting period that resulted due to the additional actions.	
8052-41-3	Stoddard solvent	The amount of reduction in release to land of the substance at the facility during the reporting period that resulted due to additional actions.	
8052-41-3	Stoddard solvent	The amount of reduction in the substance disposed on-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
8052-41-3	Stoddard solvent	The amount of reduction in the substance disposed off-site (including tailings and waste rocks) at the facility during the reporting period that resulted due to the additional actions.	
8052-41-3	Stoddard solvent	The amount of reduction in the substance recycled off-site at the facility during the reporting period that resulted due to the additional actions.	

Progress on TRA Plan - Amendments

CAS RN	Substance Name	Were any amendments made to the toxic substance reduction plan during the reporting period	Description any amendments that were made to the toxic substance reduction plan during the reporting period	Provide a public summary of the description of any amendments that were made to the toxic substance reduction plan during the reporting period
64742-48-9	Hydrotreated heavy naphtha	No		
8052-41-3	Stoddard solvent	No		



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