

Report:

RS Technologies

2014 Toxic Reduction Act (TRA) Plan Summary

Date: February 25, 2016

(Rev.A: May28,2019, changed ownership to 100% Werklund Capital Corporation/Werklund Ventures Ltd.)

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

Substance Name and cas #	Methylenebis(phenylisocyanate), cas #101-68-8 Polymeric diphenylmethane diisocyanate, cas #9016-87-9
Facility Identification and Site Address	
Legal Company Name:	RS Technologies Inc.
Facility Name:	RS Technologies Inc.
Facility Address:	22 Industrial Park Rd Tilbury, ON N0P 2L0
Facility Mailing Address (if different):	Same as above
Spatial Coordinates of Facility:	42.27333 Latitude 82.41639 Longitude
Number of Full-time Employees:	75
Facility NPRI ID:	11851
Ontario MOECC ID Number: (if assigned)	none
2 Digit NAICS Code:	32
4 Digit NAICS Code:	3252
6 Digit NAICS Code:	325220
Parent Company Information	
Name of Parent Company:	Werklund Capital Corporation/Werklund Ventures Ltd
Address of Parent Company:	4500, 400 - 3rd Avenue SW Calgary, AB T2P 4H2
Percentage Ownership of Facility:	100%
Company Contact Information	
Public Contact Name:	Kevin Koluk
Position / Title:	Facilities Manager
Telephone:	(519) 682-5214
Substances for Which Other Plans Have Been Prepared (Name, cas#)	
none	

TOXIC REDUCTION POLICY STATEMENT OF INTENT

Methylenebis(phenylisocyanate), cas #101-68-8; is currently used by RS Technologies, Inc. in Baydur STR/F 678 Component A which is used as an ingredient in the resin used in a fiberglass winding operation to manufacture composite utility poles. Once this product is blended in production into a resin it is transformed into polyurethane and no trace of the toxic substance remains. RS Technologies makes it a priority to optimize the use of this toxic substance through documented policies and procedures and employee training. RS Technologies uses this product responsibly with zero to negligible non-production releases and zero releases of environmental waste in 2014. RS Technologies does not plan on reducing the use of this product due to the fact that an alternative product has not been sourced that provides the same mechanical properties and stringent requirements for composite utility poles. The use of this toxic substance will remain a priority to optimize through existing methods and future improvement projects and investigations that are deemed feasible.

REDUCTION OBJECTIVES:

At this point in time RS Technologies plans to continue to optimize its use of this toxic substance for safe and responsible use but does not intend to reduce the use of Methylenebis(phenylisocyanate), cas #101-68-8 due to the reasons stated in this report.

TOXIC REDUCTION POLICY STATEMENT OF INTENT

Polymeric diphenylmethane diisocyanate, cas #9016-87-9; is currently used by RS Technologies, Inc. in Baydur STR/F 678 Component A which is used as an ingredient in the resin used in a fiberglass winding operation to manufacture composite utility poles. Once this product is blended in production into a resin it is transformed into polyurethane and no trace of the toxic substance remains. RS Technologies makes it a priority to optimize the use of this toxic substance through documented policies and procedures and employee training. RS Technologies uses this product responsibly with zero to negligible non-production releases and zero releases of environmental waste in 2014. RS Technologies does not plan on reducing the use of this product due to the fact that an alternative product has not been sourced that provides the same mechanical properties and stringent requirements for composite utility poles. The use of this toxic substance will remain a priority to optimize through existing methods and future improvement projects and investigations that are deemed feasible.

REDUCTION OBJECTIVES:

At this point in time RS Technologies plans to continue to optimize its use of this toxic substance for safe and responsible use but does not intend to reduce the use of Methylenebis(phenylisocyanate), cas #9016-87-9 due to the reasons stated in this report.

DESCRIPTION OF SUBSTANCE(S)

Both substances are an ingredient of one product used at RS Technologies and will travel through the process together and exhibit similar properties related to its destruction and or release. For this reason a single Toxic reduction plan has been prepared for these two substances. This is an aromatic isocyanate (MDI) used as an ingredient in manufacturing polyurethane.

TOXIC SUBSTANCE REDUCTION OPTION(S) TO BE IMPLEMENTED

There are no options which are considered to be both technically and economically feasible at this time. Based upon this RS Technologies does not intend to implement reduction options at this time.

PLAN SUMMARY STATEMENT

This plan summary accurately reflects the content of the toxic substance reduction plan for:

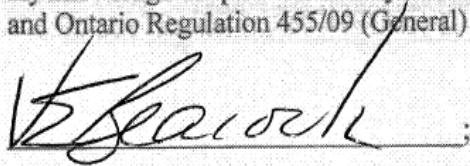
- Methylenebis(phenylisocyanate), cas #101-68-8
- Polymeric diphenylmethane diisocyanate, cas #9016-87-9

Prepared for RS Technologies, December 11, 2015.

CERTIFICATION STATEMENTS

9. PLAN CERTIFICATION FOR SUBSTANCE X

As of December __, 2015, I, Victor Beacock, 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.



December 15, 2015

Victor Beacock
Director, Operations RS Technologies (Highest Ranking Employee)

Date

As of December 18, 2015, I, Scott Manser certify that I am familiar with the processes at RS Technologies 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 December 11, 2015 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.



Scott Manser
Toxic Substance Reduction Planner
TSRP00071

DECEMBER 18, 2015
Date