

Toxics Substance Reduction Plan For

Phosphorus (7723-14-0) Particulate Matter (PM10 NA-M09) Particulate Matter (PM2.5 NA-M10)

ArcelorMittal Hamilton East 690 Strathearne Avenue North Hamilton, Ontario L8H 7N8

Prepared for: Matthew Ogus

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EXECUTIVE SUMMARY

ArcelorMittal Hamilton East operates a wire processing facility at 690 Strathearne Avenue North in Hamilton. The facility specializes in the manufacture of pre-stressed wire products for the North American automotive and construction industries. The facility is comprised of 2 pickling lines (Cleaning House #1 & #2), and 3 oil tempering lines (Oil Temper #1, #2, and #3), along with several annealing and tempering furnaces. Raw Materials in the form of carbon steel coils, lead ingots, and pickling and coating chemicals (hydrochloric acid, borax, lime, zinc phosphate, and lubricants are received via transport truck. They are then stored internally, and transferred to their point of use. In the Cleaning Process, the rod undergoes a hydrochloric acid pickling process, followed by subsequent rinsing, and removal of smut. Next the rods are coated with either Zinc Phosphate, Borax, Lime, and/or lubricant depending on customer specifications. From there, the rods are mechanically drawn into thinner gauge wires. Some of the wires will then undergo a second Cleaning and Coating Process depending on their specification and intended use. The wires which will not be Oil Tempered will then undergo a subsequent finishing operation prior to being shipped offsite. In the Oil Temper Process, wires are heated in a furnace and drawn through molten lead in a heat treating process prior to being shipped offsite.

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1.0 BASIC FACILITY INFORMATION

Substance Information						
Name	Phosphorus					
CAS #	7647-01-0					
Name	Particulate Matter (PM10)					
CAS #	NA - M09					
Name	Particulate Matter (PM2.5)					
CAS #	NA – 09					
Facility Information						
Company Name	ArcelorMittal Hamilton East					
Facility Address	690 Strathearne Avenue North, Hamilton					
Site Coordinates (main entrance of site)	17 T 598177.90 m E 4790574.58 m N elev 74.98m					
NPRI ID	4045					
MOE ID	ON 0009512					
Number of Full-Time Employees in 2011	140					
2-Digit NAICS Code	31 -33 Manufacturing					
4-Digit NAICS Code	3312 - Steel Product Manufacturing from Purchased Steel					
6-Digit NAICS Code	331222 – Steel Wire Drawing					
Parent Company Information						
Company Name	ArcelorMittal Montreal Inc.					
Company Address	3900 Route Des Acieries Contrecoeur, QC J0L 1C0					
Percent Ownership by Parent Company	100%					

Business Number	104848171					
Facility Contact Information						
Public Contact	Matthew Ogus Manager, Environment & Continuous Improvement Phone: 905-528-9473 Fax # 905 522-7044	Matthew.Ogus@arcelormittal.com Same as facility				
Technical Contact	Same as public contact					
Company Coordinator	Same as public contact					
Person who Prepared the Plan	Robin Brown Operations Manager Pinchin Environmental rbrown@pinchin.com	Phone #: 905-363-1399 Fax #: 905-363-0538 2470 Milltower Court Mississauga, ON L5N 2W5				
Highest Ranking Employee	Al Lindholm Plant Manager Phone #: 905-528-9473 Fax # 905-522-7044	al.lindholm@arcelormittal.com Address same as facility				
Planner Responsible for Making Recommendations	Robin Brown, TSRP #0018 Operations Manager Phone # 905-363-1399 Fax # 905-363-0538	rbrown@pinchin.com 2470 Milltower Court Mississauga, ON L5N 2W5				
Planner Responsible for Certification	Robin Brown, TSRP #0018 Operations Manager Phone # 905-363-1399 Fax # 905-363-0538	rbrown@pinchin.com 2470 Milltower Court Mississauga, ON L5N 2W5				
Parent Company Contact Information						
	Luc Chabot, Ing Directeur, Environnement ArcelorMittal Contrecoeur Inc Luc.chabot@arcelormittal.com	Phone: (450) 392-3521 Fax: 450-392-3528 3900 route des Acieries Contrecoeur, QC J0L 1C0				

2.0 STATEMENT OF INTENT

ArcelorMittal Hamilton East, a major steel wire producer in Ontario, commits that the environment and sustainable development are an integral part of its values, and will:

- Comply with all federal, provincial, and municipal environmental laws and regulations and act in accordance with their requirements.
- Implement an Environmental Management System in our facility providing objectives and targets to continually improve our environmental performance and reduce the impact on water and landfill pollution
- Promote environmental responsibility to our employees, suppliers, and contractors, sharing information on sound environmental management practices and providing relevant training
- Develop, improve and apply low impact environmental production methods and practices
- Perform regular monitoring of our environmental aspects and communicate the results to all levels of the organization, the authorities and stakeholders.
- Steel is the material of choice for environmental protection; not only is it environmentally friendly but it also outperforms other materials because it is readily recycled.
- ArcelorMittal Hamilton East is proud to offer quality products while respecting the environment in a way that meets the needs of our communities and future generations.
- Our environmental policy is documented as part of the Environmental Management System. It is implemented, maintained and communicated to all associates, sub-contractors and it is also available to the public.

With reference to the Ontario Toxics Reduction Act, the use of phosphorus is integral to the products that ArcelorMittal Hamilton East manufactures. Additionally, the creation of particulate matter is an unavoidable by-product of the manufacturing operations. There are no plans to reduce the use and creation of these substances, however, ArcelorMittal Hamilton East is commitment to continuous improvement and will continue to look for new opportunities and emerging technologies which will further optimize the use of these substances at the facility. The reduction objectives are outlined in Section 3 of this Plan.

3.0 OBJECTIVES OF THE PLAN & ANY TARGETS

ArcelorMittal Hamilton East prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. We will strive to optimize the use of *Phosphorus*, minimize the creation of *Particulate Matter* at the facility. No options have been identified, and as part of the continuous improvement practices at the facility, technical advances will be monitored for new opportunities to reduce the use of *Phosphorus*, and *Particulate Matter* at the facility.

continue to monitor the facility, review the process operations, and implement process improvements where possible.

7.0 OPTIONS TO BE IMPLEMENTED (OR STATEMENT THAT NONE ARE TO BE IMPLEMENTED)

ArcelorMittal Hamilton East's continuous improvement program has been successful at improving chemical efficiencies in both the chemicals used in the pickling and coatings lines, as well as the lead used in the oil temper lines. At this time, there are no new options to be implemented as the facility has taken a progress approach to implemented process improvements through the years. The facility is in the process of finalizing a technical review of the current wastewater treatment system which is expected to result in reduced water consumption, and a reduction in discharged sludge. If options are identified in this review that would reduce the use of any of the reportable substances, the plan and any objectives will be commented upon in subsequent annual reports.

8.0 CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of [Insert Date], I, Al Lindholm, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Phosphorus and Particulate Matter (PM10 & PM2.5)

RG

Af Lindholm *Plant Manager* ArcelorMittal Hamilton East

9.0 CERTIFICATION BY LICENSED PLANNER

As of December 10, 2013, I, Robin Brown certify that I am familiar with the processes at ArcelorMittal Hamilton East that use or create the toxic substances 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 toxic substance reduction plans referred to below for the toxic substances and that the plans comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Phosphorus and Particulate Matter [December 10, 2013]

Robin Brown, TSRP #0018 Operations Manager Pinchin Environmental Ltd. rbrown@pinchin.com