Annual Quantification Summary - Toxic Reduction Plan for Manganese and Chromium
## Basic Facility Information

### ID Numbers
- NPRID Number: 25448
- Business Number: 866545486

### Facility Identification and Site Address
- **Company Name**: Global File Inc.
- **Facility Name**: Global File Inc.
- **Address**: 7939 Keele St. Concord, Ontario L4K 1Y6
- **Spatial coordinates of the facility**:
  - Latitude: 43.80355
  - Longitude: -79.50016
- **UTM coordinates of the facility**:
  - UTM Zone: 17
  - UTM Easting: 620644.99
  - UTM Northing: 4851147.09

### Parent Company
- **Company Name**: Global Upholstery Co. Inc.
- **Address**: 560 Supertest Road, Downsview, ON, M3J 2M6
- **Business Number**: 130973217
- **Percentage of the facility owned by the parent company**: 80%

### Industrial Classifications
- **Two-Digit NAICS Code**: 31-33
- **Four-Digit NAICS Code**: 3372
- **Six-Digit NAICS Code**: 337214

### Total Number of Employees (or equivalent) Per Year (includes students, part-time and term employees):
- 177

### Highest Ranking Employee and Public Contact
- **Name**: Yosi Shachar
- **Position/Title**: General Manager
- **Address**: 7939 Keele St. Concord, Ontario L4K 1Y6
- **Telephone Number**: (905) 761-3284
- **Fax Number**: (905) 761-3282
- **E-mail address**: yosi@globalfile.ca

### Person who coordinated and prepared the plan
- **Name**: Ernest Itzkovich
- **Position/Title**: Director, Quality Resources
- **Address**: 7939 Keele St. Concord, Ontario L4K 1Y6
- **Telephone Number**: (905) 761-3284
- **Fax Number**: (905) 761-3282
- **E-mail address**: ernest@globalfile.ca

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May 2018
Statement of Plan Summary

This Toxic Reduction Plan summary accurately reflects the Toxic Substance Reduction Plan dated November 12, 2013 that was prepared by Global File Inc. according to Ontario Regulation 455/09.

Phase 1 Substances

Global File Inc. is a manufacturer of metal filing and storage products. The substances listed below are above the reportable threshold limits for NPRI and Ontario Regulation 455/09.

Manganese: No CAS. Number
(MSDS: 1.65% contained in steel)

Chromium: No CAS Number
(MSDS: 1.1% contained in steel)

Note: Plan for manganese and chromium are contained in this one document as they are chemical components of steel that we use to manufacture metal filing and storage products.
Statement of Intent and Objective of the Plan

MANGANESE

Statement of Intent - Manganese

Global File Inc. is committed to minimizing the environmental impact we have on our planet. Manganese is a chemical contained in the raw material we use here at Global File Inc. We intend to minimize the use of manganese. This facility does not create manganese, therefore this plan does not address reduction of creation.

Objective - Manganese

Global File Inc. is committed to continuous improvement. Our objective is to seek out and implement innovative ideas that decrease our manganese usage. Further, this plan will determine, based on the ideas formulated, to reduce the use of toxic substances whether these ideas are technically and economically feasible.

CHROMIUM

Statement of Intent - Chromium

Global File Inc. is committed to minimizing the environmental impact we have on our planet. Chromium is a chemical contained in the raw material we use here at Global File Inc. We intend to minimize the use of chromium. This facility does not create chromium, therefore this plan does not address reduction of creation.

Objective - Chromium

Global File Inc. is committed to continuous improvement. Our objective is to seek out and implement innovative ideas that decrease our chromium usage. Further, this plan will determine, based on the ideas formulated, to reduce the use of toxic substances whether these ideas are technically and economically feasible.

May 2018
Options To Reduce The Use Of Manganese and Chromium

1. **Materials or Feedstock Substitution**

Reducing the use of Manganese and Chromium through materials or feedstock substitution is not possible because Global File is a steel manufacturer. Steel is the only material Global File can use to build our products.

2. **Spill and Leak Prevention**

Reducing the use of Manganese and Chromium through spill and leak prevention is not possible because Manganese and Chromium is not in a liquid state and is a chemical contained in our steel.

3. **Training/Improved Operating Practices**

Further training and improvements to our “one off” procedure can help Global File reduce the amount of rejected parts we send to recycling. Training can teach employees how to effectively make sure they are building parts to the correct size and improvements to the procedure can help Global File catch mistakes earlier to reduce the amount of rejected parts we send to recycling thus reducing the amount of Manganese and Chromium Global File uses.

**Estimation:** With improvements made to our “one off” we estimate we can reduce the use of Manganese and Chromium by one percent.

**Calculation:** Weight of recycled rejected parts x 0.01 = Estimated reduction of recycled weight. Estimated reduction of recycled weight x 0.0165 or 0.011 = Estimated reduction in use of Manganese or Chromium.

1,561kg x 0.01 = 15.61kg

Manganese: 15.61 x 0.0165 = 0.26 kg
Chromium: 15.61 x 0.011 = 0.17 kg

**There is an estimated reduction in use of 0.26 kg of Manganese and 0.17 kg of Chromium by implementing this option.**

4. **Improved Inventory Management or Purchasing Techniques**

By consolidating the coil sizes Global File purchases to a smaller width can help reduce the amount of Manganese and Chromium used. Rather than purchase steel coils with large widths
Global File can make it policy to not purchase any steel coils larger than a width number determined by the company.

**Estimation:** Based on calculations we estimate that implementing this option can reduce the amount of Manganese and Chromium we use by twenty three percent

**Calculation:** Coil weight of smallest width divided by average weight of coil = Estimated percentage of reduction

Estimated percentage of reduction x total weight of steel purchased for 2011 = Estimated reduction of steel purchased in weight

Estimated reduction of steel purchased in weight x 0.0165 or 0.011 = Estimated reduction in use of Manganese or Chromium.

454 kg divided by 1,984 kg = 23%

0.23 x 6,032,985 kg = 1,387,586 kg

Manganese: 1,387,586 kg x 0.0165 = 22,895 kg
Chromium: 1,387,586 kg x 0.011 = 15,263 kg

**There is an estimated reduction in use of 22,895 kg of Manganese and 15,263 kg of Chromium by implementing this option.**

5. **Product Design or Reformulation**

Part consolidation is an option to reduce the use of Manganese and Chromium. Part consolidation would allow Global File to create identical parts for different products. The ability to do this would help Global File to use less coils to create products which in turn means Global File is purchasing less steel and thus reducing the amount of Manganese and Chromium used at Global File.

**Estimation:** Based on discussions with our Engineering department we estimate that this reduction option can reduce the amount of steel purchased in weight by five percent.

**Calculation:** Total steel purchased in 2011 x 0.05 = estimated steel reduction

Estimated steel reduction x 0.0165 or 0.011 = estimated reduction of Manganese or Chromium.

6,032,985 kg x 0.05 = 301,649 kg

Manganese: 301,649 kg x 0.0165 = 4,977 kg
Chromium: 301,649 kg x 0.011 = 3,318 kg
There is an estimated reduction in use of 4,977 kg of Manganese and 3,318 kg of Chromium by implementing this option.

6. **Equipment or Process Modification**

Replacing our current equipment to support the use of steel with a thinner gauge can help reduce the use of Manganese and Chromium. By having equipment that support the use of steel with a thinner gauge Global File can reduce the amount of steel used to produce our products.

**Estimation:** Based on the average change in thickness of steel for all our products we estimate we can reduce the amount of steel used by twelve percent.

**Calculation:** Total steel purchased in 2011 x 0.12 = estimated steel reduction

Estimated steel reduction x 0.0165 or 0.011 = estimated reduction of Manganese or Chromium.

6,032,985 kg x 0.12 = 723,958 kg

Manganese: 723,958 kg x 0.0165 = 11,945 kg
Chromium: 723,958 kg x 0.011 = 7,963 kg

**There is an estimated reduction in use of 11,945 kg of Manganese and 7,963 kg of Chromium by implementing this option.**

7. **On-site Reuse or Recycling**

Reusing scrap steel from larger parts to create smaller parts is an option that can be implemented to reduce the use of Manganese and Chromium. By reusing scrap steel we reduce the amount of steel Global File sends to waste and also reduces the amount of steel we have to purchase.

**Estimation:** Based on our estimates a full implementation of this option can reduce our steel usage by three percent.

**Calculations:** Total steel purchased in 2011 x 0.03 = estimated steel reduction

Estimated steel reduction x 0.0165 or 0.011 = estimated reduction of Manganese or Chromium

6,032,985 kg x 0.03 = 180,989 kg

Manganese: 180,989 kg x 0.0165 = 2,986 kg
Chromium: 180,989 kg x 0.011 = 1,991 kg

**There is an estimated reduction in off-site recycling of 2,986 kg of manganese and 1,991 kg of Chromium by implementing this option.**
### Summary of Manganese for 2011-2017 reporting year:

<table>
<thead>
<tr>
<th>Year</th>
<th>Used (tonnes/yr.)</th>
<th>Created (tonnes/yr.)</th>
<th>Contained in Product (tonnes/yr.)</th>
<th>On-site release (tonnes/yr.)</th>
<th>Disposal (tonnes/yr.)</th>
<th>Off-site recycling (tonnes/yr.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011 to 2016</td>
<td>&gt;10 to 100</td>
<td>0</td>
<td>&gt;10 to 100</td>
<td>&gt;0 to 1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2017</td>
<td>&gt;10 to 100</td>
<td>0</td>
<td>&gt;10 to 100</td>
<td>&gt;0 to 1</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

### Summary of Chromium for 2011-2017 reporting year:

<table>
<thead>
<tr>
<th>Year</th>
<th>Used (tonnes/yr.)</th>
<th>Created (tonnes/yr.)</th>
<th>Contained in Product (tonnes/yr.)</th>
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<td>0</td>
</tr>
<tr>
<td>2017</td>
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<td>0</td>
<td>&gt;10 to 100</td>
<td>&gt;0 to 1</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

### Certification

As of May 28, 2018, I, Yosi Shachar, certify that I have read the toxic substance reduction plan dated November 12, 2013 for the toxic substances referred to below and am familiar with its contents and, to my knowledge, this version of the plan is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Chromium and Manganese

Yosi Shachar  
General Manager,  
Global File Inc.