



NPRI and GHG Assessment Report

2022 Reporting Year

**Prepared For:
Bend All Automotive
Tooling Centre
Ayr, Ontario**

EKG Project: 23-05-019

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Prepared by:
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1.0 INTRODUCTION

E.K. Gillin & Associates Inc. (EKG) was retained by Bend All Automotive – 115 Wanless Tooling Centre to prepare the annual National Pollutant Release Inventory (NPRI) and Greenhouse Gas (GHG) Reports under the relevant federal and provincial programs.

EKG collected the relevant information, performed necessary calculations, and, if necessary, prepared the reports for submission through the Single Window Information Manager (SWIM).

This report forms the basis for compliance with the following programs:

- National Pollutant Release Inventory (NPRI) under the Canadian Environmental Protection Act
- Greenhouse Gas Reporting Program (GHGRP) under the Canadian Environmental Protection Act
- O. Reg. 390/18: Greenhouse Gas Emissions: Quantification, Reporting and Verification under Ontario's Environmental Protection Act

Melissa Schmidt was the primary contact and provided the necessary information for the assessment.

2.0 NATIONAL POLLUTANT RELEASE INVENTORY (NPRI)

2.1 NPRI Regulatory Summary

Sections 46-53 of The Canadian Environmental Protection Act, 1999 (CEPA) establish the requirement for facilities to report substances in order to establish and publish a national inventory. This data is used for conducting research, creating an inventory of data, and formulating objectives and codes of practice.

In general, an NPRI report is required for any facility:

- The equivalent of 20,000 hours of labour or more annually (equal to 10 full-time employees).
- and,
- Any substance in NPRI has manufactured, processed, or otherwise used (MPO) quantities that are equal to or greater than the corresponding MPO threshold identified in NPRI.

In addition, the facility must meet any of the other reporting criteria for substances on the NPRI substance list. A list of substances and their reporting requirements are published in the Canada Gazette, which is to be used as a guide for NPRI reporting.

Annual reports are submitted online using the Single Window Information Manager (SWIM) portal.

2.2 NPRI Accounting and Reporting Summary

NPRI accounting for the facility was conducted in accordance with common methods and guidance from the Guide for Reporting to the National Pollutant Release Inventory 2022 and 2024 (NPRI Guidance Document).

The facility does not meet the reporting criteria for any substances for the reporting year 2022.

A full summary of the data provided and calculations used in the formation of the report can be found in Appendix A.

3.0 Greenhouse Gas Emissions Reporting

3.1 Regulatory Summary

The Greenhouse Gas Reporting Program (GHGRP) collects information on greenhouse gas emissions from facilities across Canada. The program is also administered under section 46 of CEPA. This data is used to maintain a Greenhouse Gas Inventory for Canada as part of its obligations under the United Nations Framework Convention on Climate Change (UNFCCC). This agreement requires Canada to keep accurate records of all sources and sinks of GHGs caused by human activity and develop regulatory initiatives to reduce GHG emissions. Facilities are required to report to the federal GHGRP if 10,000 tonnes or more of GHGs in carbon dioxide equivalent units per year. Additionally, facilities engaged in specific industries are required to provide additional data.

Ontario Regulation 390/18: Greenhouse Gas Emissions: Quantification, Reporting and Verification under Ontario's Environmental Protection Act requires some Ontario facilities to report annual greenhouse gas emissions to the Ministry of the Environment, Conservation and Parks (MECP). This initiative is intended to ensure that large industrial emitters are held accountable for their greenhouse gas emissions. Facilities are required to submit a report if they import greater than zero megawatt hours of electricity per year or emit 10,000 tonnes or more of carbon dioxide equivalent per year.

3.2 Summary of GHG Emissions

GHG accounting for the facility was done in accordance with the current federal Technical Guidance on Reporting Greenhouse Gas Emissions (Federal GHG Guideline) and the current provincial Guideline for Quantification, Reporting and Verification of Greenhouse Gas Emissions.

The sources at the Bend All Facility included in O. Reg. 390/18 are stationary combustion sources. These Bend All sources do not exceed the reportable threshold and therefore does not need to report GHG emissions for the reporting year 2022.

A full summary of the data provided, and calculations used in the formation of the report can be found in Appendix B.

4.0 ADMINISTRATIVE INFORMATION

The administrative information provided by the site is provided in Appendix C.

Should you have any questions regarding this assessment, please contact your EKGinc representative immediately.

APPENDIX A
NPRI Summary

RAW MATERIAL USAGE QUANTITIES
BEND ALL AUTOMOTIVE
AYR, ONTARIO

115 WANLESS DRIVE

<u>LUBES/OILS/COOLANTS</u>	<i>2021 Usage</i>	<i>Units</i>	<i>2022 Usage</i>	<i>Units</i>	<i>Conversion to Kg</i>	<i>SDS Reviewed for NPRI Substances</i>	<i>CAS #</i>	<i>NPRI Substance Name</i>	<i>Part #</i>	<i>Reporting Threshold</i>
PCMPEP2 MP Grease EP2 Cartridge 10x400G	0	Grams/year	8000	Grams/year	8	None				
Mobil Oil DTE Light (20L Pail)	0	L/year	0	L/year	0	None				
Hycut SW 68 (Omni Tool - 190kg drum)	0	kg/year	0	kg/year	0	Yes	N/A	Ester Oils	Part 4	10 tonnes
Nova Met 100 (Omni Tool) (200L/Drum)	200	L/year	0	L/year	0	Yes	64742-53-6	Distillates (petroleum), hydrotreated light naphthenic	Part 4	10 tonnes
Waylube Oil (45gal/drum & 5Gal pail)	45	Gal/Year	5	Gal/year	42	Yes	112-34-5	Ethanol, 2(2-butyxyethoxy)	Part 4/5	10 tonnes/1 tonne
							64742-53-6	Distillates (petroleum), hydrotreated light naphthenic	Part 4	10 tonnes
NEW 2022										
Hydraulic 32 (205L/drum)	N/A	N/A	205	L/Year	197	Yes	64742-54-7	Distillates (petroleum), hydrotreated heavy paraffinic	Part 4	10 tonnes

NOTE:
Steel/Metal/Alloys - all production has been moved to 575/655 Waydom Plants
No recycling from site any value associated with 575/655 facilities

Part 1A Substances

CAS #	CAS#	2022 Usage	Total Used 2022 (t)
Substance Name	Name		
Mobil Oil DTE Light (20L Pail)	1.00%	0.00	0.0

2022 Totals	Name
Total Amount Regulated Substance (t)	0.0
Total Amount Regulated >1% Conc. (t)	0.0
Mass Threshold (t)	10
REPORTABLE (YES/NO)	NO

Part 1B Substances

The facility did not use NPRI Part 1B Compounds in 2022.

Part 2 Substances

The facility did not use NPRI Part 2 Compounds in 2022.

Part 3 Substances

The facility did not use NPRI Part 3 Compounds in 2022.

PART 4 Substances

Contaminants for Gas Combustion in 2022	Emission Factor (lbs/m ³)	Total Gas Usage (m ³)	Emissions/yr (lbs)	Emissions/yr (tonnes)	Threshold (tonnes)	Reportable?
Nitrogen Oxides	0.003531467	377295.00	1332.40	0.60	20.00	NO
Sulphur Dioxide	0.000021189	377295.00	7.99	0.00	20.00	NO
Carbon Monoxide	0.000194231	377295.00	73.28	0.03	20.00	NO
VOCs	0.000788	377295.00	297.31	0.13	10.00	SEE BELOW
PM10	0.000268391	377295.00	101.26	0.05	0.50	NO
PM2.5*	0.000190	377295.00	71.60	0.03	0.30	NO

* Based on USEPA Emission Ratio PM2.5:PM10 = 0.75:1.0

Product	VOC (%)	Total Used in 2022 (t)
PCMPEP2 MP Grease EP2	100.00%	0.0
Mobil Oil DTE Light	100.00%	0.0
Hycut SW 68	100.00%	0.0
Nova Met 100	100.00%	0.0
Hydraulic 32	100.00%	0.2
Waylube Oil	100.00%	0.0

2022 Totals	VOC	PM10	PM2.5
Total Amount Regulated Substance (t)	0.4	0.05	0.03
Total Released to Air (t)	N/A	0.05	0.03
Mass Threshold (t)	10	0.5	0.3
REPORTABLE (YES/NO)	NO	NO	NO

NOTES:

It is assumed that 100% of all VOCs used were emitted to atmosphere from the Tooling Centre
PM 2.5 is a subset of PM10 and is included in the overall value under PM10

Part 5 Substances

CAS #	111-76-2	Total Used 2022 (t)
Substance Name	2-Butoxyethanol	
Nova Met 100 (Omni Tool)	5.00%	0.0

2022 Totals	2-Butoxyethanol
Total Amount Used (t)	0.0
Total Released to Air (t)	0.0
Mass Threshold [Released to Air] (t)	1
REPORTABLE (YES/NO)	NO

Facility did not meet criteria in 2022, based on criteria in Part 4 not being met.

NOTES:

Based on Part 4 VOC Reporting, the site is not required
No Nova Met was reported as used in 2022.

APPENDIX B
GHG Summary

Greenhouse Gases

Site Data		
Stationary Fuel Combustion		
Diesel	0	kL
Natural Gas	69047	m ³
On-Site Transportation		
Diesel	0	kL
Propane	0	kL

Non-Variable Fuels						
	CO ₂ Emission Factor		CH ₄ Emission Factor		N ₂ O Emission Factor	
	Value	Unit	Value	Unit	Value	Unit
Stationary Fuel Combustion						
Diesel	0	kg/kL	0.078	kg/kL	0.02	kg/kL
On-Site Transportation						
Diesel	0	kg/kL	0.073	kg/kL	0.02	kg/kL
Propane	0	kg/kL	0.024	kg/kL	0.087	kg/kL

Variable Fuels						
	Default High Heat Value (for CO ₂ Equation)		CH ₄ Emission Factor		N ₂ O Emission Factor	
	Value	Unit	Value	Unit	Value	Unit
Natural Gas	39.3	MJ/m ³	0.037	g/m ³	0.033	g/m ³

Global Warming Potential (GWP)	
Carbon Dioxide - CO ₂	1
Methane - CH ₄	25
Nitrous Oxide - N ₂ O	298

CO ₂ e									
	Stationary Fuel Combustion	Industrial Process	Industrial Product Use	Fugitive			On-Site Transportation	Waste	Wastewater
				Venting	Flaring	Leakage			
Carbon Dioxide - CO ₂ (tonnes)	136	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A
Methane - CH ₄ (tonnes)	0	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A
Nitrous Oxide - N ₂ O (tonnes)	0	N/A	N/A	N/A	N/A	N/A	0	N/A	N/A
YYYY Total - CO ₂ e (tonnes)	137								
Reporting Threshold (tonnes)	10000								
Reportable YES/NO	NO								

Facility did not meet criteria in 2022.

APPENDIX C
Administrative Information.

2022 NPRI Reporting Year

ADMINISTRATIVE INFORMATION
BEND ALL AUTOMOTIVE
AYR, ONTARIO

575&655 Waydom Drive

115 Wanless

A1.0 Reporting Year, NPRI ID, Language and Web Site Address

A1.1	NPRI ID	05993	05994
A1.2	Language	English	English
A1.4	Web Site Address	www.bend-all.com	www.bend-all.com
A1.5	Dun and Bradstreet (D-U-N-S) Number	24-895-6030	25-193-8593
A1.6	Business number (9 digits)	122615503	122615503

A2.0 Facility Identification and Site Address

A2.1	Company Name	BendAll Automotive	BendAll Automotive
A2.2	Facility Name	Plant 1 & Plant 2	Tooling Centre
A2.3	Street Address	575 and 655 Waydom Drive	115 Wanless Drive
A2.4	(Street Address 2)		
A2.5	City/District	Ayr	Ayr
A2.6	Province or Territory Code	Ontario	Ontario
A2.7	Postal Code	NOB 1E0	NOB 1E0
A2.12	MOE ID	8289	8288

A3.0 Identification of Parent Companies

P1.0	Business number (9 digits)	821875648	821875648
P1.1	% Ownership	100%	100%
P1.2	Parent Company Name	HDT Automotive Solutions LLC	HDT Automotive Solutions LLC
P1.3	Address	6554 Lakeshore Rd	6554 Lakeshore Rd
P1.4	(Address)		
P1.5	City/District	Lexington	Lexington
P1.6	Province/Territory		
P1.7	Postal Code		
P1.8	State	Michigan	Michigan
P1.9	ZIP Code	48450	48450
P1.10	Country	United States	United States

A4.0 Facility Public Contact

A4.1	Title (Mr./Ms./etc)	Mr.	Mr.
A4.2	First Name	Bela	Bela
A4.3	Last Name	Ferencz	Ferencz
A4.4	Position	Manufacturing Engineering Manager	Manufacturing Engineering Manager
A4.5	Phone	(519) 623-2001	(519) 623-2001
A4.6	Phone Extension	2233	2233
A4.7	Fax		
A4.8	e-mail address	Bela.Ferencz@htd-ca.com	Bela.Ferencz@htd-ca.com

A5.0 Facility Public Contact Address

A5.1	Company Name		
A5.2	Facility Name		
A5.3	Mailing Address	Same as Site Address	Same as Site Address
A5.4	(Mailing Address 2)		
A5.5	City/District		
A5.6	Province/Territory		
A5.7	Postal Code		

A6.0 Facility Technical Contact

A6.1	Title (Mr./Ms./etc)	Mr.	Mr.
A6.2	First Name	Bela	Bela
A6.3	Last Name	Ferencz	Ferencz
A6.4	Position	Manufacturing Engineering Manager	Manufacturing Engineering Manager
A6.5	Phone	(519) 623-2001	(519) 623-2001
A6.6	Phone Extension	2233	2233
A6.7	Fax		
A6.8	e-mail address	Bela.Ferencz@htd-ca.com	Bela.Ferencz@htd-ca.com

A7.0 Facility Technical Contact Address

A7.1	Company Name	Same as Site Address	Same as Site Address
A7.2	Facility Name		
A7.3	Mailing Address		
A7.4	(Mailing Address 2)		
A7.5	City/District		
A7.6	Province/Territory		
A7.7	Postal Code		
A7.8	State		
A7.9	ZIP Code		

2022 NPRI Reporting Year

ADMINISTRATIVE INFORMATION
BEND ALL AUTOMOTIVE
AYR, ONTARIO

575&655 Waydom Drive

115 Wanless

A7.10	Country		
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A8.0 Company Coordinator

A8.1	Title (Mr./Ms./etc)	Mr.	Mr.
A8.2	First Name	Bela	Bela
A8.3	Last Name	Ferencz	Ferencz
A8.4	Position	Manufacturing Engineering Manager	Manufacturing Engineering Manager
A8.5	Phone	(519) 623-2001	(519) 623-2001
A8.6	Phone Extension	2233	2233
A8.7	Fax		
A8.8	e-mail address	Bela.Ferencz@hdt-ca.com	Bela.Ferencz@hdt-ca.com

A9.0 Company Coordinator Address

A9.1	Company Name	Same as Site Address	Same as Site Address
A9.2	Facility Name		
A9.3	Mailing Address		
A9.4	(Mailing Address 2)		
A9.5	City/District		
A9.6	Province/Territory		
A9.7	Postal Code		
A9.8	State		
A9.9	ZIP Code		
A9.10	Country		

A10.0 Industrial Classification Codes

A10.1	Two-digit Canadian SIC Code	32	32
A10.2	Four-digit Canadian SIC Code	3259	3259
A10.3	Four-digit U.S. SIC Code	3714	3714
A10.4	Two-digit NAICS Code	31-33	31-33
A10.5	Four-digit NAICS Code	3329	3329
A10.6	Six-digit NAICS Canada Code	332999	332999

A11.0 Full-time Employees

= total worker hours per year/2,000 hrs per worker

A11.1	Number of (Eq.) Full-time Employees	438	22
A11.2	Activities to Which the 20 000 hr Employee Threshold does not Apply		

A12.0 Activities Relevant to the Reporting of Dioxins/Furans and HCB

A12.1	Facility Used for Wood Preservation (PCP)	No	No
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A13.0 Activities Relevant to the Reporting of PAH

A13.1	Facility Used for Wood Preservation (creosote)	No	No
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A14.0 Other Environmental Regulations or Permits (optional)

A14.1	Other Environmental Reporting/Permits	No	No
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A15.0 Comments

A15.1	Comments (Facility)	No	No
A15.2	Comments (Pollution Prevention)		

A16.0 Company Official Certifying this Submission

A16.1	Title (Mr./Ms./etc)	Mr.	Mr.
A16.2	First Name	Bela	Bela
A16.3	Last Name	Ferencz	Ferencz
A16.4	Position	Manufacturing Engineering Manager	Manufacturing Engineering Manager
A16.5	Phone	(519) 623-2001	(519) 623-2001
A16.6	Phone Extension	2233	2233
A16.7	Fax		
A16.8	e-mail address	Bela.Ferencz@hdt-ca.com	Bela.Ferencz@hdt-ca.com

A17.0 Company Official Address

A17.1	Company Name	Same As Above	Same As Above
A17.2	Facility Name		
A17.3	Mailing Address		
A17.4	(Mailing Address)		
A17.5	City/District		
A17.6	Province/Territory		

2022 NPRI Reporting Year

ADMINISTRATIVE INFORMATION
BEND ALL AUTOMOTIVE
AYR, ONTARIO

575&655 Waydom Drive

115 Wanless

A17.7	Postal Code		
A17.8	State		
A17.9	ZIP Code		
A17.10	Country		

A19.0 **Facility Latitude and Longitude**

A19.1	Facility Latitude (decimal degrees)	43.3389320 (43° 20' 20.16" N)	43.3373620 (43° 20' 14.50" N)
A19.2	Facility Longitude (decimal degrees)	-80.435077043 (80° 26' 6.28" W)	-80.4490370 (80° 26' 56.53" W)

A21.0 **Independent Contractor**

A21.1	Title/First Name	Patrick	Patrick
A21.3	Last Name	Smale	Smale
A21.4	Position	Industrial Hygienist	Industrial Hygienist
A21.5	Telephone	519-502-2991	519-502-2991
A21.7	Facsimile No.	519-662-6595	519-662-6595
A21.8	Email Address	patrick.smale@ekqinc.com	patrick.smale@ekqinc.com

A25.0 **Criteria Air Contaminants (CACs)**

A25.1	Required to report for one or more CACs?		
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T1.0	Facility Operating Schedule (Temporal Variation)		
T1.1	Days of Operation	5 (occasional overtime work on Saturdays)	5
T1.2 a)	Hours of Operation	24	10
T1.2 b)	Average daily start time	6	7
T1.3	Shut down longer than one week?	NA	NA
T1.4	Date/time of shutdown longer than one week	Start Date:	Start Date:
		Start Time:	Start Time:
		End Date:	End Date:
		End Time:	End Time:
T1.5	Comments (Shutdown periods) (optional)		

A26.0 **Pollution Prevention**

A26.1	Pollution Prevention Plans	N	N
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