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| TREGASKISS LIMITED. 2570 North Talbot Road Oldcastle (Windsor) Ontario N0R 1L0 | TOXIC REDUCTION PLAN SUMMARY | |
| | Doc. No TRA-002 | Rev. No. 1.0 |
| | Date: November 26, 2012 | Page 1 of 3 |

BASIC FACILITY INFORMATION:

| | | |
|---|--|---|
| Name & CAS # of the Substance | Copper | 7440-50-8 |
| Facility Identification and Site Address | | |
| Company Name | Tregaskiss Ltd. | |
| Facility Name | Tregaskiss, a Division of ITW Canada | |
| Facility Address | Physical Address: | Mailing Address: |
| | 2570 North Talbot Road, Windsor, Ontario N0R 1L0 | 2570 North Talbot Road, Windsor, Ontario N0R 1L0 |
| Spatial Coordinates of Facility | 17T 338162.9 m E, 4678173.0 m N UTM (NAD 83) | |
| Number of Full Time Employees | 105 | |
| NPRI ID | 0000011585 | |
| Business Number | 891747982 | |
| Primary North American Industrial Classification System Code (NAICS) | | |
| 2 Digit NAICS ID | 33 | Manufacturing |
| 4 Digit NAICS ID | 3339 | Other General-Purpose Machinery Manufacturing |
| 6 Digit NAICS ID | 333990 | All Other General-Purpose Machinery Mfg. |
| Facility Contact Information | | |
| Facility Public Contact | Kevin Jenkins, <i>Manufacturing Engineer</i> | |
| | kevin.jenkins@tregaskiss.com | |
| | Phone: 519-737-6966 | |
| | Fax: 519-737-1530 | |

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| TREGASKISS LIMITED. 2570 North Talbot Road Oldcastle (Windsor) Ontario N0R 1L0 | TOXIC REDUCTION PLAN SUMMARY | |
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| | Date: August 17, 2012 | Page 2 of 3 |

STATEMENT OF INTENT:

Tregaskiss intends to implement selected toxic substance reduction options to reduce its use of copper.

REDUCTION OBJECTIVES:

Tregaskiss intends to implement specific toxic substance reduction options to do their best to reduce/avoid the amount of copper used by 5,954 kg annually when compared to 2011 usage data.

DESCRIPTION OF SUBSTANCE:

A main substance found in most MIG welding equipment is copper. Copper's primary function is to act as an electrical conductor.

TOXIC SUBSTANCE REDUCTION OPTION TO BE IMPLEMENTED:

The following options have been identified for implementation to reduce the use, creation or release of copper:

- Employee Involvement Program – Implementation: Immediate
- Spill Plan/Spill Kits – Implementation: Immediate
- Reuse of bar ends for prototyping - Implementation: January 2013
- MRD Inventory Control – Implementation: April 2013
- Use of Extruded Materials – Implementation: 1st Quarter 2013
- Improved Operating Practices – Sweepings – Implementation: Immediate

| Option(s) | Used | Created | On-Site Releases | | | Disposal | | Transfer Off-Site for Recycling | Contained in Product |
|---|------------------|---------|------------------|------|---------------|----------|--------------|---------------------------------|----------------------|
| | | | Air | Land | Water | On-Site | Off-Site | | |
| <i>Option 8.4</i> Spill Plan | 0 | 0 | 0 | 0 | 0.1 (100%) | 0 | 0 | 0 | 0 |
| <i>Option 8.5</i> Bar End Reuse | 100 (0.6%) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| <i>Option 8.6-1</i> Inventory Control | 3,526 (20%) | 0 | 0 | 0 | 0 | 0 | 0 | 352.6 (20%) | 0 |
| <i>Option 8.6-2</i> Use Extruded Materials | 2,228 (12.6%) | 0 | 0 | 0 | 0 | 0 | 0 | 222.8 (12.6%) | 0 |
| <i>Option 8.7</i> Recycle turnings/chips | 0 | 0 | 0 | 0 | 0 | 0 | 100 (69%) | 0 | 0 |

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PLAN SUMMARY STATEMENT:

This plan accurately reflects the content of the toxic substance reduction plan for copper, prepared by Tregaskiss dated November 26, 2012.

Certification by Highest Ranking Employee

As of Dec 12, 2012, I, Joe Shaheen, 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 *Toxic Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

[Copper]




 Joe Shaheen
 General Manager
 Tregaskiss Ltd.

Dec 12, 2012
 Date

Certification by Licensed Planner

As of November 26, 2012, I, Erik Martinez, certify that I am familiar with the processes at Tregaskiss Ltd., 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 *Toxic Reduction Act, 2009* that are set out in the plan dated November 26, 2012 and that the plan complies with the Act and Ontario Regulation 455.09 (General) made under the Act.

[Copper]



 Erik Martinez, P.Eng.
 Conestoga-Rovers and Associates
 Toxic Substance Reduction Planner
 Licence #TSRP0005

Nov 27, 2012
 Date