TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the Toxics Reduction Act and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the content of the plans for chromium, copper, lead, manganese, and nickel.

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This Plan Summary applies to the following prescribed toxic substances: Chromium, Copper, Lead, Manganese, Nickel [Per O.Reg. 455/09; "no single CAS numbers apply to these substances"]
NPRI and O.Reg.127/01 Identification Numbers	NPRI ID: 011434 O.Reg.127/01 ID: N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	Cam Tran Co. Ltd. 203 & 209 Purdy Road, P.O. Box 866 Colborne, ON K0K 1S0
The number of full time employee equivalents at the facility	90
NAICS codes and the six-digit NAICS Canada code	33 – Manufacturing 3262 – Electrical Equipment Manufacturing 335311 - Power, Distribution and Specialty Transformers Manufacturing
Public contact	Dave Reinhardus Director of Mechanical and Industrial Engineering Cam Tran Co. Ltd. - 203 & 209 Purdy Road, P.O. Box 866 Colborne, ON, K0K 1S0 905-355-3224 x506
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	UTM Zone 18T 268040 E, 4878370 N
Parent Company Information	N/A

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Chromium*
Copper*
Lead*
Manganese*
Nickel*

*Per O.Reg. 455/09, "no single CAS numbers apply to these substances"

Statement of Intent

As required by s.4(1) of the TRA, a Plan must include either a statement of the Facility's intent to reduce the use and/or creation of the Toxic Substance at the Facility, or the reasons for not including this statement.

Cam Tran's goal is to provide quality products with industry leading service and lead times. In doing so, Cam Tran also strives to set an example for environmental leadership by offering customers opportunities to reduce waste by reusing and recycling major transformer and switchgear components. Previously manufactured components may be able to be refurbished and returned to operable states which reduces waste to landfills and increases the efficiency of materials usage.

The objectives of the Toxics Reduction Act align well with Cam Tran's commitment to minimize the impact of operations and products on the environment. Cam Tran intends to reduce the use of toxic materials proportional to production (i.e. on a per-unit basis) at the Facility through the implementation of measures that are technically and economically feasible and do not compromise the ability for Cam Tran to sustainably provide the goods and services required by clients.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the Plan are as follows:

- To evaluate potential options for the reduction in use of toxic materials currently found at the Facility and establish a path forward that includes at least one feasible reduction option;
- To identify technological or financial roadblocks preventing further toxics reduction which may be overcome in the future; and,
- Document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to each Toxic Substance.

Description of Why the Toxic Substance Is Used or Created

Raw materials containing toxics that are used at the Facility include copper wire and bars (containing copper), mild steel (containing chromium, copper, lead, manganese and nickel), stainless steel (containing chromium, copper, manganese and nickel), aluminum alloys (containing chromium, copper, lead, manganese and nickel), and steel shot (containing manganese). Every toxic material is contained within the structure of the raw materials and is considered integral to the desired physical properties of the raw materials.

Steel and stainless steel are the main components used to manufacture transformer tanks due to their strength and durability. Aluminum and copper wire and bars are utilized as conductors and manufactured to form the coils (wound wire) and conducting plates (bars for electrical connections) in the transformers. The physical properties of these materials, including their strength and/or conductivity are essential to the performance of the final products.

No toxic substances are created at the Facility.

Description of Toxic Substance Reduction Options to be Implemented

Facility personnel have considered each of the seven categories for toxic substance reduction options and have arrived at two options in the 'product design or reformulation' category that will be implemented.

Facility production and management staff have identified potential efficiency gains related to the reduction of steel in large transformer tanks and the reduction of copper or aluminum wire in transformer coils. Each of these options require the implementation of new technology to allow for the redesign of large transformers and transformer coils and the implementation of the new designs in production.

It is estimated that the implementation of product redesign efforts around large transformers will result in an annual decrease of toxic substances contained in final products of the following amounts:

Toxic Material	Mass of Toxic Reduction	Percentage Toxics Reduction
Chromium	0.207 tonnes	0.9%
Copper	0.122 tonnes	0.03%
Lead	42.7 kg	0.9%
Manganese	0.268 tonnes	0.5%
Nickel	0.256 tonnes	0.9%

Similarly, the annual decrease in the amount of toxic substances contained in final products resulting from the implementation of product redesign efforts around transformer coils are estimated to be the following:

Toxic Material	Mass of Toxic Reduction	Percentage Toxic Reduction
Chromium	0.0268 tonnes	0.1%
Copper	16.215 tonnes	3.5%
Lead	26.8 kg	0.5%
Manganese	0.0268 tonnes	0.05%
Nickel	0.0268 tonnes	0.09%

These values are specific to production levels and customer requirements in 2011 only, however are considered to be the best available estimates of expected toxics reduction resulting from the implementation of the reduction options.

It is expected that the implementation of these toxics reduction options will occur between January and December, 2013, with the estimated toxics reduction being first wholly realized (for a full year of operation after the implementation of the options) in December 2014.

Planner License Number

As required by s.18(2) of O. Reg. 455/09 (as amended by s. 9(2) of O. Reg. 214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan is as follows:

Jonathan Michael Fabro
Golder Associates Ltd.
Toxic Substance Reduction Planner License Number TSRP0189

Copies of the Certification

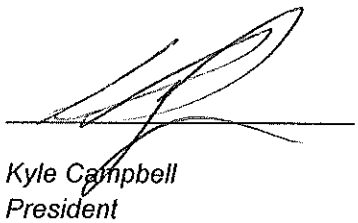
Certification statements are provided in the following page.

Toxic Substance Reduction Plans Certification by Highest Ranking Employee

As required by s.4(2) of the *Toxics Reduction Act* (TRA), Toxic Substance Reduction Plans must contain a certification, signed by the highest ranking employee at the Facility who has management responsibilities relating to the Facility.

The following Certification Statement is being made under s.19(2) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) and satisfies the requirements of s.4(2) of the TRA for the Toxic Substance Plans that are assembled within this single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

> *As of December 20, 2012, I, Kyle Campbell, 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.*
>
> - *Chromium* *(dated, December 20, 2012)*
> - *Copper* *(dated, December 20, 2012)*
> - *Lead* *(dated, December 20, 2012)*
> - *Manganese* *(dated, December 20, 2012)*
> - *Nickel* *(dated, December 20, 2012)*



12/20/12

Kyle Campbell
President
Cam Tran Co. Ltd
203 & 209 Purdy Road, Colborne, ON

Date

December 20, 2012

Project No. 12-1151-0299

Dave Reinhardus
Cam Tran Co. Ltd.

LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CERTIFICATION STATEMENT FOR PHASE I TOXIC SUBSTANCE REDUCTION PLANS FOR CAM TRAN CO. LTD. – 203 & 209 PURDY ROAD, COLBORNE, ONTARIO

Dear Mr. Reinhardus:

Golder Associates Ltd. (Golder) was retained by Cam Tran Co. Ltd to provide various services pertaining to Phase I Toxic Substance Reduction Plan preparation under the *Toxic Reduction Act* (TRA), including Toxic Substance Reduction Planner (Planner) certification of Phase I Toxic Substance Reduction Plans (the Plans) for the operations at 203 & 209 Purdy Road, Colborne, Ontario (the Facility).

The following Planner Certification Statement which is made under s.19.1(4) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) satisfies the Planner Certification requirements for the Plans that are assembled as a single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

> *As of December 12, 2012, I, Jonathan Michael Fabro certify that I am familiar with the processes at the Cam Tran Facility located at 203 & 209 Purdy Road in Colborne, Ontario 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.*

- *Chromium (December 20, 2012)*
- *Lead (December 20, 2012)*
- *Nickel (December 20, 2012)*
- *Copper (December 20, 2012)*
- *Manganese (December 20, 2012)*

Date: December 20, 2012

J. Michael Fabro
Toxic Substance Reduction Planner
License No. TSRP0189

Keith G. Lesarge, M.Sc., P.Geo.
Principal, Senior Environmental Scientist

JMF/KGL/sll

Golder Associates Ltd.
309 Exeter Road, Unit #1, London, Ontario, Canada N6L 1C1
Tel: +1 (519) 652 0099 Fax: +1 (519) 652 6299 www.golder.com
Golder Associates: Operations in Africa, Asia, Australasia, Europe, North America and South America