

## 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 plan for Zinc.

### 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: Zinc [Per O.Reg. 455/09; "no single CAS numbers apply to this substance"]
NPRI and O.Reg.127/01 Identification Numbers	NPRI ID: 011434
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	110
NAICS codes and the six-digit NAICS Canada code	33 – Manufacturing 3262 – Electrical Equipment Manufacturing 335311 - Power, Distribution and Specialty Transformers Manufacturing
Public contact	Craig Hoskin OEE Leader Cam Tran Co. Ltd. – 203 & 209 Purdy Road, P.O. Box 866 Colborne, ON K0K 1S0 905-355-3224 x562
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 an additional Toxic Substance Reduction Plan for the following prescribed Toxic Substance as first time reporting was completed in 2012:

Zinc\*

This is in addition the previously prepared plans for:

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.

A statement of the Facility's intent to reduce the "use" of the Toxic Substance has not been included as a part of this Plan. The Toxic Substance cannot be "created" in the Facility process and therefore no statement with respect to intent to reduce the creation of the Toxic Substance is required.

The activity that has been classified as a "use" of the Toxic Substance for the purpose of the required TRA Quantification, Accounting and Reporting exercise for the Toxic Substance is the use of copper wire and bars, and use of aluminum alloys which contain the Toxic Substance. The Toxic Substance is contained within the structure of these raw materials and is considered integral to the desired physical properties of the raw materials. Therefore the use of the Toxic Substance can only be reduced by reducing the Facility's usage of these raw materials.

Cam Tran has already reduced the use of raw materials containing toxic substances (which includes zinc, in addition to chromium, copper, lead, manganese and nickel) proportional to production (i.e. on a per-unit basis) at the Facility through the implementation of reduction options, which are described in detail in the Facility's Master Document Supporting Various Toxic Substance Reduction Plans, Version 1.0, December 2012 (Master Plan), Sections 8.0 and 9.0. Briefly, these options included:

- Manufacturing custom-sized tanks as opposed to using stock sizes; and
- Utilizing new design software to create more efficient transformer coils.

Therefore, the Facility is of the opinion that it has previously optimized its control of the use and subsequent release of the Toxic Substance to the greatest extent that can reasonably be expected, and therefore a statement of the Facility's intent to reduce "use" of the Toxic Substance has not been included as part of this Plan.

## Objectives of the Toxic Substance Reduction Plan

This Toxics Substance Reduction Plan (Plan) has three objectives:

- provide the reader with information on measures already implemented at the Facility which control the "use" and subsequent release of the Toxic Substance;
- provide support for the Facility's position with respect to the Statement of Intent of this Plan; and
- document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance.

## Description of Why the Toxic Substance Is Used or Created

The processes at the Facility are organized into stages beginning with materials receiving, manufacturing of transformer tanks (Preparation Stage), cleaning and painting of tanks (Production Stage 1), manufacture of coils and transformer assembly (Production Stage 2), and a shipping stage. Raw materials containing the Toxic Substance that are used at the Facility include copper and aluminum alloy bars. The Toxic Substance is contained within the structure of the raw materials and is considered integral to the desired physical properties of the raw materials.

All raw materials are received from suppliers and stored indoors. Aluminum and copper alloys are utilized as conductors and manufactured (through cutting and welding) to form the 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.

Steel shot is used in the painting preparation stage to scarify the surface of metals to improve paint adhesion and long term paint performance. The welding of steel and stainless steel creates an oxide layer which cannot be effectively chemically pre-treated to increase paint adhesion, so the mechanical shot blasting method is used instead.

## **Rationale for Not Implementing Toxic Substance Reduction Options**

As required by s.18(4) of O. Reg. 455/09 (as amended by s.9(3) of O. Reg. 214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

In light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no additional toxic substance reduction options can be identified in any of the seven toxic substance reduction categories. The Facility is of the opinion that it has previously optimized its control of the use and subsequent release of the Toxic Substance to the greatest extent that can reasonably be expected.

Therefore, the rationale for not implementing toxic substance reduction options is that no additional toxic substance reduction options could be identified.

## **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:

James McEvoy, P.Eng.  
Air Quality Engineer  
Golder Associates Ltd.  
Toxic Substance Reduction Planner License Number TSRP0288

## **Copies of the Certification**

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. As per Ministry of the Environment and Climate Change guidance, in the event that Plans are submitted after the regulatory deadline, a modified statement mirroring the standard certification statement but acknowledging the lack of compliance with the regulatory deadline must be included.

The Confirmation Statements fulfilling these requirements are provided on the next page.

### Toxic Substance Reduction Plan Highest Ranking Employee Confirmation Statement

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 (HRE) relating to the Facility. The information provided below is intended to satisfy this requirement for the respective Toxic Substance Reduction Plans listed below.

As per TRA guidance, if a Toxic Substance Reduction Plan is completed after the date prescribed in s.11.1 of Ontario Regulation (O.Reg.) 455/09, a rationale must be provided by the HRE which explains the reason that the Plan was completed after the prescribed date. Also following TRA guidance, a "Confirmation Statement" is being provided in place of the corresponding Certification Statement prescribed in s.19 of O.Reg.455/09.

The following statement, made on behalf of the HRE satisfies the requirement for a written rationale for completing the Toxic Substance Reduction Plan listed below after the date prescribed in s.11.1 of O.Reg.455/09:

*The Toxic Substance Reduction Plan subject to this Confirmation Statement had not been completed in accordance with s.11.1 of O.Reg.455/09. This Plan could not be submitted on time due to a lack of budget and resources at the Facility.*

The following Confirmation Statement satisfies the requirements of s.4(2) of the TRA for the Toxic Substance Plan, with the exception of s.11.1 of O.Reg.455/09:

*As of March 14, 2016, I, Kyle Campbell, 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 Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act, with the exception of section 11.1.*

- Zinc (dated March 14, 2016)

  
\_\_\_\_\_  
Kyle Campbell  
President  
Cam Tran Co. Ltd.

March 14, 2016  
\_\_\_\_\_  
Date

March 14, 2016

Project No. 04-1182-143

Craig Hoskin  
Cam Tran Co. Ltd.

**LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CONFIRMATION STATEMENT FOR TOXIC  
SUBSTANCE REDUCTION PLAN FOR CAM TRAN CO. LTD. 203 & 209 PURDY ROAD, COLBORNE,  
ONTARIO.**

Dear Mr. Hoskin:

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

Following TRA guidance, in circumstances where a Plan is prepared after the date prescribed in s.11.1 of Ontario Regulation (O.Reg.) 455/09, a Planner "Confirmation Statement" is to be provided in place of the corresponding Certification Statement prescribed in s.19 of O.Reg.455/09. The following Confirmation Statement satisfies this requirement. Furthermore, the following Confirmation Statement is limited to the respective version of the Plan which is dated as indicated in the Confirmation Statement:

*As of March 2016, I, James McEvoy, certify that I am familiar with the processes at the Cam Tran Co. Ltd. 203 & 209 Purdy Road Facility that use 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 Toxics Reduction Act, 2009 that are set out in the toxic substance reduction plan referred to below for the toxic substance and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act, with the exception of section 11.1.*

- Zinc (dated March 14, 2016)



James McEvoy, P.Eng.  
Toxic Substance Reduction Planner  
License No. TSRP0288  
BSC/JDM/FSC/ng

March 14, 2016

Date

