

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 Cobalt.

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: Cobalt and its compounds; no single CAS number
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, 218 Industrial Park Drive Colborne, ON Mailing address: 203 & 209 Purdy Road P.O. Box 866 Colborne, ON K0K 1S0
The number of full time employee equivalents at the facility	159
NAICS codes and the six-digit NAICS Canada code	33 – Manufacturing 3262 – Electrical Equipment Manufacturing 335311 - Power, Distribution and Specialty Transformers Manufacturing
Public contact	Don Roy HS Leader Cam Tran Co. Ltd. – 203 & 209 Purdy Road, P.O. Box 866 Colborne, ON K0K 1S0 905-355-3224 x505
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 a Toxic Substance Reduction Plan for the following prescribed Toxic Substance as first time reporting was completed in 2016:

Cobalt*

This is in addition the previously prepared plans for:

Chromium*

Copper*

Lead*

Manganese*

Nickel*

Zinc*

* 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 cobalt has not been included as a part of this Plan. Cobalt cannot be "created" in the Facility process and therefore no statement with respect to intent to reduce the creation of cobalt is required.

The activity that has been classified as a "use" of cobalt for the required TRA Quantification, Accounting and Reporting exercise is the use of stainless steel and aluminum products which contain cobalt. Cobalt 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 cobalt 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 cobalt, in addition to chromium, copper, lead, manganese, nickel and zinc) 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 believes it has previously optimized its control of the use and subsequent release of cobalt to the greatest extent that can reasonably be expected, and therefore a statement of the Facility's intent to reduce "use" of cobalt 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 cobalt;
- 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. The raw materials which contain cobalt are stainless steel, aluminum alloys and rolled aluminum. Cobalt is contained within the structure of these 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. Stainless steel is a main component used to manufacture the transformer tanks (through cutting, welding, and bending) due to its strength and durability. Aluminum alloys and rolls are utilized as conductors and manufactured (through cutting, welding and winding) 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.

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 believes it has previously optimized its control of the use and subsequent release of cobalt 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.
Senior Air Quality Specialist
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, Conservation and Parks 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.