# PLAN SUMMARY TRAXLE MANUFACTURING GUELPH, ONTARIO

Name & CAS # of Substance	Manganese	7439-96-5			
Substances for which other plans have been prepared	Nickel	7440-02-0			
Facility Identification and Site Address					
Company Name	Linamar Corporation				
Facility Name	Traxle Manufacturing				
	Physical Address:	Mailing Address: (if different)			
Facility Address	280 Speedvale Avenue West				
	Guelph, Ontario				
	N1H 1C4				
Spatial Coordination of	Easting: 557791.60				
Facility	Northing: 4821707.96				
Number of Employees	185				
NPRI ID	3165				
Ontario MOE ID Number					
	Parent Company (PC) Informati	on			
PC Name & Address	Linamar Corporation, 287 Speedvale Avenue West,				
	Guelph, Ontario N1H 1C5				
Percent Ownership for each PC	100%				
Business Number for PC	103333662				
Primary North Ar	nerican Industrial Classification	System Code (NAICS)			
2 Digit NAICS Code	33 Manufacturing				
4 Digit NAICS Code	3327 - Machine Shops, Turned Product, and Screw, Nut and Bolt				
	Manufacturing				
6 Digit NAICS Code	332710 - Machine Shops				
	Company Contact Information	n			
Facility Public Contact	Mr. Jeff Collins, LPS Manager				
	jeff.collins@linamar.com				
	Phone: (519) 824-8899	Same address as facility			
	Fax: (519) 824-0797				

## PLAN SUMMARY STATEMENT

This plan summary reflects the content of the toxic substance reduction plan for Traxle Manufacturing (Traxle) for Manganese, prepared by Conestoga-Rovers & Associates.

### STATEMENT OF INTENT

Traxle Manufacturing (Traxle) is committed to playing a leadership role in protecting the environment. Whenever feasible, we will reduce the use of Manganese in compliance with all Federal and Provincial Regulations.

### REDUCTION OBJECTIVES

Traxle prides itself on technological innovation in order to produce high quality automotive parts in an environmentally responsible manner. Through this plan, Traxle will determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time.

### REDUCTION OPTIONS TO BE IMPLEMENTED

The following options have been identified for implementation to reduce the use and/or amount of Manganese used:

 Implement improved practices/procedures amongst operators to reduce scrap by reviewing the amount of scrap produced and holding training sessions with employees

This option is an on-going procedure at Traxle, with annual reduction targets that will change from year to year. The schedule for this reduction option is given below:

Step	Description	Estimated Timelines
1	Review of existing scrap procedures to identify	January 2013 - Ongoing
	possible improvements	
2	Hold Annual Session to update operators based on	Annual
	new findings	
3	Timeline for implementation of Manganese	End of 2013
	Reductions	

Traxle has carefully reviewed the toxic substance use reduction options to ensure that there is no net negative impact to the environment or public health. The selected options will serve to reduce the amount of Manganese used in the process, and will not create any toxic by-products.

## CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 21, 2012, I, Paul Brophy, 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.

Manganese

Paul Brophy

General Manager

Traxle Manufacturing

## **CERTIFICATION BY LICENSED PLANNER**

As of December 21, 2012, I, Dana Lauder, certify that I am familiar with the processes at Traxle 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 *Toxics Reduction Act*, 2009 that are set out in the plan dated December 21, 2012, and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Nickel

Dana Lauder

Conestoga-Rovers & Associates

Planner License #TSRP00014

dlauder@craworld.com

## PLAN SUMMARY TRAXLE MANUFACTURING GUELPH, ONTARIO

Name & CAS # of Substance	Nickel	7440-02-0			
Substances for which other plans have been prepared	Manganese	7439-96-5			
Facility Identification and Site Address					
Company Name	Linamar Corporation				
Facility Name	Traxle Manufacturing				
	Physical Address:	Mailing Address: (if different)			
Facility Address	280 Speedvale Avenue West				
	Guelph, Ontario				
	N1H 1C4				
Spatial Coordination of	Easting: 557791.60				
Facility	Northing: 4821707.96				
Number of Employees	216				
NPRI ID	3165				
Ontario MOE ID Number					
	Parent Company (PC) Informat	ion			
PC Name & Address	Linamar Corporation, 287 Speedvale Avenue West,				
	Guelph, Ontario N1H 1C5				
Percent Ownership for each PC	100%				
Business Number for PC	103333662				
Primary North An	nerican Industrial Classification	System Code (NAICS)			
2 Digit NAICS Code	33 Manufacturing				
4 Digit NAICS Code	3327 - Machine Shops, Turned Product, and Screw, Nut and Bolt Manufacturing				
6 Digit NAICS Code	332710 - Machine Shops				
	Company Contact Informatio	n			
Facility Public Contact	Mr. Jeff Collins, LPS Manager				
	jeff.collins@linamar.com				
	Phone: (519) 824-8899	Same address as facility			
	Fax: (519) 824-0797				

#### PLAN SUMMARY STATEMENT

This plan summary reflects the content of the toxic substance reduction plan for Traxle Manufacturing (Traxle) for Nickel, prepared by Conestoga-Rovers & Associates.

### **STATEMENT OF INTENT**

Traxle Manufacturing (Traxle) is committed to playing a leadership role in protecting the environment. Whenever feasible, we will reduce the use of Nickel in compliance with all Federal and Provincial Regulations.

### **REDUCTION OBJECTIVES**

Traxle prides itself on technological innovation in order to produce high quality automotive parts in an environmentally responsible manner. Through this plan, Traxle will determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time.

## REDUCTION OPTIONS TO BE IMPLEMENTED

The following options have been identified for implementation to reduce the use and/or amount of Nickel used:

 Implement improved practices/procedures amongst operators to reduce scrap by reviewing the amount of scrap produced and holding training sessions with employees

This option is an on-going procedure at Traxle, with annual reduction targets that will change from year to year. The schedule for this reduction option is given below:

Step	Description	Estimated Timelines
1	Review of existing scrap procedures to identify possible improvements	January 2013 - Ongoing
2	Hold Annual Session to update operators based on new findings	Annual
3	Timeline for implementation of Nickel Reductions	End of 2013

Traxle has carefully reviewed the toxic substance use reduction options to ensure that there is no net negative impact to the environment or public health. The selected options

will serve to reduce the amount of Nickel used in the process, and will not create any toxic by-products.

### CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 21, 2012, I, Paul Brophy, 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.

Nickel

Paul Brophy

General Manager

Traxle Manufacturing

### **CERTIFICATION BY LICENSED PLANNER**

As of December 21, 2012, I, Dana Lauder, certify that I am familiar with the processes at Traxle 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 *Toxics Reduction Act*, 2009 that are set out in the plan dated December 21, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Nickel

Dana Lauder

Conestoga-Rovers & Associates

Planner License #TSRP00014

dlauder@craworld.com