



**Toxics Substance Reduction Plan Summary
For
Lead (CAS #NA-08)
Chromium (CAS #NA)
Hexavalent Chromium (CAS #NA)**

**Ampacet Canada
101 Sasaga Drive
Kitchener, Ontario
N2C 2G8**

December 21, 2012
Pinchin File: 67074

Copyright © 2012 by Pinchin Environmental Ltd.

TABLE OF CONTENTS

1.0	BASIC FACILITY INFORMATION.....	1
2.0	OTHER TOXIC SUBSTANCES	1
3.0	STATEMENT OF INTENT	2
4.0	OBJECTIVES OF THE PLAN & ANY TARGETS	2
5.0	DESCRIPTION OF WHY THE TOXIC SUBSTANCE IS USED OR CREATED	2
6.0	OPTIONS TO BE IMPLEMENTED (OR STATEMENT THAT NONE ARE TO BE IMPLEMENTED).....	2
7.0	ESTIMATED REDUCTIONS UNDER THE OPTIONS SELECTED (IF ANY)	2
8.0	TIMELINES FOR ACHIEVING ESTIMATED REDUCTION (IF ANY).....	2
9.0	CONTENTS OF THIS PLAN SUMMARY REFLECTS PLAN	2
10.0	COPY OF CERTIFICATIONS	3

1.0 BASIC FACILITY INFORMATION

Substance Information		
Substance Name	CAS #	
Lead (and its compounds)	N/A	
Chromium (and its compounds), except hexavalent chromium	N/A	
Hexavalent Chromium	N/A	
Facility Information		
Company Name	Ampacet Canada	
Facility Address	101 Sasaga Drive, Kitchener, ON, N2C 2G8	
Site Coordinates (main entrance of site)	544325.61 E, 4806050.78 N; Zone 17	
NPRI ID	931	
MOE ID	1280500	
Number of Full-Time Employees in 2011	70	
2-Digit NAICS Code	31-33 - Manufacturing	
4-Digit NAICS Code	3261 – Plastic Product Manufacturing	
6-Digit NAICS Code	326198 – All Other Plastic Product Mfg.	
Facility Contact Information		
Public Contact	Mr. Gerry Smith ISO/H&S Administrator Phone #: 519-748-5576 x290 Fax #: 519-748-9767	Gerald.smith@ampacet.com 101 Sasaga Drive Kitchener, ON N2C 2G8

2.0 OTHER TOXIC SUBSTANCES

No toxic substances other than the toxic substances identified in Section 1 used or created at the facility required a plan.

3.0 STATEMENT OF INTENT

Ampacet Canada is committed to playing a leadership role in protecting the environment. Whenever feasible, we will optimize the use and reduce releases of Lead, Chromium, and Hexavalent Chromium contained in the lead chromate raw materials in compliance with all Federal and Provincial regulations.

4.0 OBJECTIVES OF THE PLAN & ANY TARGETS

Ampacet Canada prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. Ampacet will strive to optimize the use of Lead, Chromium, and Hexavalent Chromium and reduce releases of these substances at the facility. Further, this plan will determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time.

5.0 DESCRIPTION OF WHY THE TOXIC SUBSTANCE IS USED OR CREATED

Lead and chromium is used as a main composition of the pigments used at the facility to provide quality colour concentrations.

6.0 OPTIONS TO BE IMPLEMENTED (OR STATEMENT THAT NONE ARE TO BE IMPLEMENTED)

Two options have been identified and described below.

- Eliminate finished product loss from transfer equipment during a production run.
- Reduce raw material loss per bag through best practice training of blender operators.

7.0 ESTIMATED REDUCTIONS UNDER THE OPTIONS SELECTED (IF ANY)

Eliminating finished product loss from transfer equipment would result in an estimated reduction of 0.33% Lead, Chromium and Hexavalent Chromium.

Reducing raw material loss per bag through best practice training of blender operators would result in an estimated reduction of 50% of Lead, Chromium, and Hexavalent Chromium.

8.0 TIMELINES FOR ACHIEVING ESTIMATED REDUCTION (IF ANY)

The anticipated date to achieve the reduction of lead, chromium and hexavalent is April 1, 2013 for the two options proposed for implementation.

9.0 CONTENTS OF THIS PLAN SUMMARY REFLECTS PLAN

This Plan Summary accurately reflects the Toxic Substance Reduction Plans dated December 13, 2012, prepared for the substances listed in Section 1.0 of this Summary.

10.0 COPY OF CERTIFICATIONS

8.0 CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 14, 2012, I, Terry Elliott certify that I have read the toxic substance reduction plan for the toxic substances 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 the Ontario Regulation 455/09 (General) made under that Act.

Lead, December 13, 2012

Chromium, December 13, 2012

Hexavalent Chromium, December 13, 2012



Terry J. Elliott
General Manager
Ampacet Canada Company

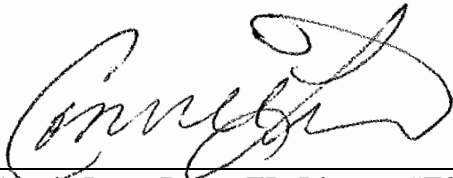
9.0 CERTIFICATION BY LICENSED PLANNER

As of December 13, 2012, I, Connie Lum certify that I am familiar with the processes at Ampacet Canada 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 the Ontario Regulation 455/09 (General) made under that Act.

Lead, December 13, 2012

Chromium, December 13, 2012

Hexavalent Chromium, December 13, 2012



Connie Lum, B.Sc., EP, License #TSRP0089
Senior Project Manager
Pinchin Environmental Ltd.
clum@pinchin.com

Pinchin Master Report Guide, Ver. 1, May 2007

J:\67000s\67074 Ampacet\Draft TRA Plan\Ampacet TRA Plan - Lead and Chromium.docx