

## Toxic Substance Reduction Plan Summary

### Basic Facility Information

<b>Name &amp; CAS of Substance</b>	Copper	N/A
<b>Substances for which other plans have been prepared</b>	N/A	N/A
<b>Facility Identification and Site Address</b>		
<b>Company Name</b>	Resistance Welding Products Ltd.	
<b>Facility Name</b>	Resistance Welding Products Ltd.	
<b>Facility Address</b>	9270 Middle Line, Blenheim, ON, N0P 1A0	
<b>Spatial Coordinates of Facility</b>	Latitude: 42.3328 Longitude: -82.0105	<i>Expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum</i>
<b>Number of Employees</b>	24	
<b>NPRI ID Number</b>	5837	
<b>Ontario MOE ID Number</b>	****	
<b>Business Number</b>	104484670	
<b>Primary North American Industrial Classification System Code (NAICS)</b>		
<b>2 Digit NAICS Code</b>	33	
<b>4 Digit NAICS Code</b>	3329	
<b>6 Digit NAICS Code</b>	332999	
<b>Company Contact Information</b>		
<b>Facility Public Contact</b>	Mr. Al McGuigan	Operations Manager
	a.mcguigan@rwpweld.com	
	Phone: (519) 676-8173	Same address as facility

### Plan Summary Statement

As required by s.24(1)8 of O.Reg. 455/09 this plan summary accurately reflects the content of the toxic substance reduction plan for copper, prepared by Resistance Welding Products Ltd. (RWP) and dated June 15, 2014.

### Statement of Intent

RWP is committed to demonstrating the highest standards of environmental management and employee safety. Copper is being used by RWP in their processes.

Although RWP continues to pursue environmentally responsible business practices, no statement of intent to reduce the use and creation of the toxic substance through the TRA process is included as part of this Plan.

**Reduction Objectives**

The company does not intend to reduce its use of copper at this time.

**Description of Substance**

Copper is a main ingredient found in the material used by RWP to produce their products.

**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:

Geri Penner

Ecotech Planners & Advisors Inc.

Toxic Substance Reduction Planner License #TSRP0240

**Rationale for Not Implementing Toxic Reduction Plan Options**

Copper is a main component in the products manufactured at RWP and their customers demand specific grades of metal containing copper and specific processes be followed in order to obtain a maximum quality product. As a result the company is unable to commit to any of the Options that were presented throughout the plan. None were found to be Economically or Technically Feasible at this time.

Certification by Highest Ranking Employee

As of June 23, 2014, I, Al McGuigan 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 Toxic Reductions Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

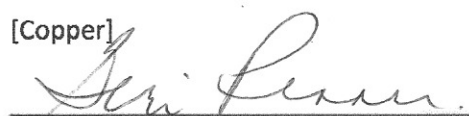
[Copper]

  
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Al McGuigan  
Operations Manager  
Resistance Welding Products Ltd.

Certification by a Licensed Planner

As of June 23, 2014, I, Geri Penner, certify that I am familiar with the processes at RWP that uses 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 Toxic Reduction Act, 2009 that are set out in the plan dated December 20, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

[Copper]

  
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Geri Penner (Planner License #TSRP0240)  
Environmental Consultant / Toxic Substance Reduction Planner  
Ecotech Planners & Advisors Inc.