

Toxic Substance Plan Statement

Indalco has completed a Toxic Substance Reduction Plan for their facility and this plan has examined various options for the reduction in the use of Ethanol at the facility. Of the four (4) options developed and assessed in the plan, none were determined to be technically feasible.

Toxic Substance Plan Summary and Certification

Company Name:	Indalco	Parent Company:	Lincoln Electric Company of Canada LP
Address:	939 Gana Court, Mississauga	Address:	179 Wickstead Avenue Toronto
Number of Employees	106	UTM Spatial Coordinates	43.66580 -79.68840
NAICS Code	331317	NPRI ID #	0000005733
		Ontario MOE ID #	NA
Facility Public Contact	Gladwyn Issac		
Position	EHS Leader	Email	gladwyn_issac@Lincolnelectric.com
Phone #:	(905) 3641584		
Toxic Substances	CAS#		
Ethanol	64-17-5		

Toxic Reduction Policy Statement of Intent

Ethanol (a phase 2 toxic substance) is currently used by Indalco for the preparation of a wire lubricant which is used in the spooling area of the facility. Indalco intends to reduce the use of this toxic substance at the facility where possible. This facility does not create Ethanol; therefore, this plan will not address reducing its creation.

Reduction Objectives

Indalco prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. Indalco will strive to reduce the use of the Phase 2 toxic substance Ethanol. This plan will determine the technical and economic feasibility of each option identified to determine which, if any, are viable for implementation at this time.

Description of Substances

Ethanol is used at the facility for the mixing of a wire lubricant which is used in the spooling area. Indalco used 1.7 Tons of Ethanol in the 2016 Calendar year. Ethanol is a Phase 2 substance; however, 2016 was the first year in which the threshold of 1.0 tons was exceeded for Ethanol. As such, a reduction plan for Ethanol was not done previously.

Toxic Substance Reduction Option to be Implemented

Indalco Alloys has examined a total of four (4) options for the reduction of the toxic substances Ethanol. Of these options, Indalco has decided to not implement any new reduction options.

Plan Summary Statement

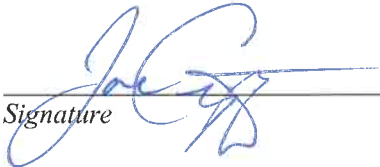
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Certification by Highest Ranking Employee

As of December 19, 2017, I, Joe Cacioppo, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Ethanol CAS 64-17-5


Signature

December 19, 2017

Certification by Licensed Planner

As of December 19, 2017, I, Stewart McLellan certify that I am familiar with the processes at Indalco Alloys 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 Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Ethanol – Plan Dated December 19th, 2017



December 19, 2017

Stewart McLellan, C.E.T
Toxic Substance Reduction Planner, TRSP0257
Cardinal Environmental Consulting Services Ltd.