

Toxic Substance Plan Statement

Trefilal II has completed a Toxic Substance Reduction Plan for their facility and this plan has examined various options for the reduction in the use of Sulfuric acid at the facility. Of the two (2) options developed and assessed in the plan, none were determined to be technically feasible.

Toxic Substance Plan Summary and Certification

Company Name:	Trefilal II	Parent Company:	Air Liquide Canada Inc.
Address:	1430 Tessier Street, Hawkesbury	Address:	1700-125 Rene-Levesque, Montreal, Quebec, H3B5E6
Number of Employees	15	UTM Spatial Coordinates	45.61010 -74.60850
NAICS Code	333990	NPRI ID #	0000002939
		Ontario MOE ID #	NA
Facility Public Contact	Yves Morin		
Position	Plant Manager		
Phone #:	(613) 636-0683	Email	yves.Morin@Lincolnelectric.com
Toxic Substances	CAS#		
Sulphuric Acid	7664-93-9		

Toxic Reduction Policy Statement of Intent

Sulphuric Acid (a Phase 1 toxic substance) is currently used by Trefilal II in the welding wire production process. Trefilal II is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use of sulphuric acid in full compliance with all federal and provincial regulations. This facility does not create sulphuric acid; therefore this plan will not address reducing its creation. Toxic substance reduction will be an ongoing effort at Trefilal II and we will continue to monitor technological advancements to ensure that options that are both technologically and economically viable are implemented at our plant where possible.

Reduction Objectives

Trefilal II prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. Trefilal II will strive to reduce the use of the Phase 1 toxic substance Sulphuric acid. 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

Sulphuric acid is used at the facility as a reactant in the copper coating process associated with the production of welding wire. Trefilal II used 13.02 Tons of Sulphuric acid in the 2016 Calendar year. Sulphuric acid is a Phase 1 substance; however, 2016 was the first year in which the Trefilal II facility reported for Sulphuric acid. As such, a reduction plan for Sulphuric acid was not done previously.

Toxic Substance Reduction Option to be Implemented

Trefilal II has reviewed numerous options to reduce the use of Sulphuric acid. After completing a technical feasibility assessment, Trefilal II has found no technically feasible options at this time. It should be noted that a significant process modification consisting of the installation of a sulphuric acid and aqueous copper sulphate dosing system was completed by Trefilal II in 2015. Installation of this dosing system has resulted in a significant reduction in the use of Sulphuric acid in the processes conducted at the plant.

Plan Summary Statement

Trefilal II has completed a Toxic Substance Reduction Plan for their facility and this plan has examined various options for the reduction in the use of Sulphuric acid at the facility.

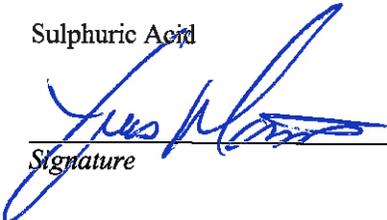
Of the two (2) options developed and assessed in the plan, none were determined to be technically feasible. Trefilal II has decided not to implement any new reduction options at this time.

Certification by Highest Ranking Employee

As of December 15, 2017, I, Yves Morin, 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:

Sulphuric Acid


Signature

December 15, 2017

Certification by Licensed Planner

As of December 15, 2017, I, Stewart McLellan certify that I am familiar with the processes at Trifilal II 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:

Sulphuric acid – Plan Dated December 15, 2017



December 15, 2017

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