

Toxic Substance Plan Summary and Certification

Company Name:	Victaulic Company of Canada	Parent Company:	Victaulic
Address:	115 Newkirk Road, Richmond Hill Ontario L4C 3G5	Address:	4901 Kesslerville Rd East Easton, PA 18044
Number of Employees	80	UTM Spatial Coordinates	43.88150 N -79.42720 W
NAICS Code	331529	NPRI ID #	0000005874
		Ontario MOE ID #	NA
Facility Public Contact	Fraser Pegg		
Position	EH&S		
Phone #:	(905) 884-7444	Email	fpegg@victaulic.com
Toxic Substances	CAS#		
Copper	NA- 06		
Lead	NA- 14		
Zinc	NA- 08		

Toxic Reduction Policy Statement of Intent

Copper, lead and zinc are currently used at Victaulic to manufacture bronze and brass parts. We intend to reduce the use of this toxic substance at the facility. This facility does not create toxic substances; therefore this plan will not address reducing its creation.

Reduction Objectives

Victaulic Company of Canada prides itself on technological innovation in order to produce high quality products in an environmentally responsible manner. Victaulic will strive to reduce the use of the toxic substances copper, lead and zinc at the. 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.

Description of Substances

Victaulic produces high quality non-ferrous sand castings for the electrical, plumbing, pump, valve, metering and defense industries. Copper, lead and zinc are contained within the various alloys used on site to create the company's products. Zinc is also purchased as a pure ingot which is added to various alloys during melting to replace the oxidized zinc.

Toxic Substance Reduction Option to be Implemented

Victaulic has examined a total of eight (8) options for the reduction of the toxic substances Copper, Zinc and Lead. Of these eight options, Victaulic has decided to implement two options with these being Option #5, upgrading crucible furnaces and Option 8 development and delivery of training to melting area employees.

Plan Summary Statement

Victaulic has completed a Toxic Substance Reduction Plan for their Richmond Hill facility which has resulted in the selection of two reduction options for implementation. Upon full completion of implementation, Victaulic will have a significant reduction in the use of Copper, Zinc and Lead while at the same time maintaining, at a minimum, 2011 production rates.

Full implementation of this plan will result in a reduction in copper usage of 29.402 tonnes (2.69%), Zinc usage of 1.898 tonnes (4.89%) and Lead usage of 1.584 tonnes (2.14%).

Certification by Highest Ranking Employee

As of December 27, 2012, I, Mario D'Ambrosio, 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:

Copper
Lead
Zinc



Signature

December 27, 2012

Certification by Licensed Planner

As of December 27, 2012, I, Stewart McLellan (TSRP0257) certify that I am familiar with the processes at Victaulic Company of 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 Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Copper – Plan Dated December 27, 2012
Lead- Plan Dated December 27, 2012
Zinc- Plan Dated December 27, 2012



December 27, 2012

Signature