

TRA Plan Summary – Copper

Basic Facility Information

Name & CAS # of Substance	Copper	7440-50-8
Substances for which Other Plans have been Prepared	Manganese	7439-96-5
	Nickel	7440-02-0
Facility Identification and Site Address		
Company Name	Linamar Corporation	
Facility Name	Traxle Manufacturing	
Facility Address	280 Speedvale Avenue West Guelph, Ontario N1H 1C4	
Spatial Coordination of Facility	Easting: 557791.60 Northing: 4821707.96	
Number of Employees	221	
NPRI ID	3165	
Parent Company (PC) Information		
PC Name & Address	Linamar Corporation, 287 Speedvale Avenue West, Guelph, Ontario N1H 1C5	
Percent Ownership for each PC	100 percent	
Business Number for PC	103333662	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 - Manufacturing	
4 Digit NAICS Code	3327 – Machine Shops, Turned Product, and Screw, Nut and Bolt Manufacturing	
6 Digit NAICS Code	332710 – Machine Shops	

Company Contact Information		
Facility Public Contact	Mr. Jeff Collins	Same as Facility
	LPS Manager	
	jeff.collins@linamar.com	
	Phone: (519) 824-8899	
	Fax: (519) 824-0797	
Facility Technical Contact:	Mr. Jeff Collins	Same as Facility
	LPS Manager	
	jeff.collins@linamar.com	
	Phone: (519) 824-8899	
	Fax: (519) 824-0797	
Company Coordinator Contact	Mr. Jeff Collins	Same as Facility
	LPS Manager	
	jeff.collins@linamar.com	
	Phone: (519) 824-8899	
	Fax: (519) 824-0797	
Person who Prepared the Plan: (if different from the Coordinator)	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates 651 Colby Dr. Waterloo, ON N2V 1C2
	Consultant	
	dlauder@croworld.com	
	Phone: (519) 884-0510 ext. 2299	
	Fax: (519) 884-0525	
Highest Ranking Employee	Mr. Paul Brophy	Same as Facility
	General Manager	
	paul.brophy@linamar.com	
	Phone: (519) 824-8899	
	Fax: (519) 824-0797	
Planner Information:		
Planner Responsible for Making Recommendations	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates Ltd. 651 Colby Drive Waterloo, ON N2V 1C2
	Planner License No: TSRP0014	
	dlauder@croworld.com	
	Phone: (519) 884-0510	
Planner Responsible for Certification	Ms. Dana Lauder, P.Eng.	Conestoga-Rovers & Associates Ltd. 651 Colby Drive Waterloo, ON N2V 1C2
	Planner License No: TSRP0014	
	dlauder@croworld.com	
	Phone: (519) 884-0510	

Toxic Reduction Policy Statement of Intent

Traxle Manufacturing (Traxle) intends to reduce the use and disposals off-site of copper. Traxle does not create any of the toxic substances and therefore, this plan does not address the reduction of use.

Reduction Objectives

The objective of this plan is for Traxle to determine the technical and economic feasibility of each reduction option available to determine, which, if any, are available for implementation at this time.

Description of Facility

Traxle produces automotive parts from metal raw materials. Raw metal materials are brought to the facility where they are machined into automotive parts, then washed and packaged for shipment. These raw materials contain Copper as a constituent material. The North American Industry Classification System (NAICS) Code that applies to this Facility is 332710 – Machine shops. These raw materials contain copper as a constituent material.

In 2012, the Facility operated 24 hours per day, 7 days per week.

Toxic Substance Reduction Options to Be Implemented

The following option has been identified for implementation to reduce the use and/or amount of copper transferred:

- Implement improved practices/procedures amongst operators to reduce scrap by reviewing the amount of scrap produced and holding training sessions with employees

This option is an on-going procedure at Traxle, with annual reduction targets that will change from year to year. The schedule for this reduction option is given below:

<i>Step</i>	<i>Description</i>	<i>Estimated Timelines</i>
1	Review of existing scrap procedures to identify possible improvements	Implemented
2	Hold Annual Session to update operators based on new findings	Annual
3	Timeline for implementation of copper Reductions	End of 2014

Traxle has carefully reviewed the toxic substance use reduction options to ensure that there is no net negative impact to the environment or public health. The selected options will serve to reduce the amount of copper used in the process, and will not create any toxic by-products.

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for Traxle.

Certification by Highest Ranking Employee

Attached.

Certification by Licensed Planner

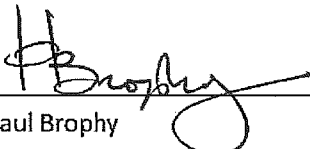
Attached.

Section 8.0 Plan Certifications

Certification by Highest Ranking Employee

As of December 19, 2013, I, Paul Brophy, 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 *Toxics Reduction Act 2009* and Ontario Regulation 455/09 (General) made under that Act.

Copper




Paul Brophy
General Manager
Traxle Manufacturing

20 Dec 13
Date

Certification by Licensed Planner

As of December 19, 2013, I, Dana Lauder, certify that I am familiar with the processes at Traxle that use or create 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 *Toxics Reduction Act, 2009* that are set out in the plan dated December 19, 2013 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Copper



Dana Lauder, P. Eng.
Planner License # TSRP0014
Conestoga-Rovers & Associates Ltd.

12/20/13
Date