Toxic Substance Reduction Plan for fischer Stainless Steel Tubing Inc. December 31, 2012

Summary

Chemical Name and CAS#: chromium (NA-04), nickel (NA-11), and manganese

(NA-09).

NPRI ID Number: 11221

O.Reg. 127/05 ID Number:

Company Name: fischer Canada Inc.

Company Address: 190 Frobisher Drive, Waterloo, ON N2V 2A2

Number of employees: 183

Two Digit NAICS Code: 33 - Manufacturing

Four Digit NAICS Code: 3312 - Steel Product Mfg. from Purchased Steel

Public Contact:

Name: Sarah Prell - Environmental Management Systems Coordinator

Address: 190 Frobisher Drive, Waterloo, ON N2V 2A2

Phone Number: 519-746-0088 Fax Number: 519-746-3941

E-mail: aprell@fischerca.com

UTM Spatial Coordinates (NAD83):

Latitude: 43.5085

Longitude: -80.5256 Datum: 1983

UTM: 17T 538223, 4817528

Statement of Intent: Chromium (metallic) and nickel are currently used by

fischer in nine processes. Manganese is used in these same nine plus an additional four processes. fischer intends to reduce the scrap amount of steel generated by the facility so that more of it is used in the final product. This facility does not create, destroy, or transform any of these contaminants; therefore, this plan will not address

these aspects.

Reason for Use: Chromium, nickel, and manganese are all used at the

facility because they are components of stainless steel or carbon steel. fischer's customers decide which grade of steel they would like their product made from and dictate this to fischer in order to achieve the properties required in

the final product.

Target: fischer intends to reduce its lost material rate to three point

five percent (3.5%) in four to six years.

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Objective:

fischer produces high quality stainless steel tubing products for the automotive industry in an environmentally responsible manner. fischer will strive to minimize the amount of scrap, and other losses, and maximize the amount of purchased material that leaves as product.

Certification: Highest Ranking Employee

As of December 21, 2012, I, Thomas Prell, certify that I have read the toxic substance reduction plan for the toxic substances 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.

Chromium, Nickel, and Manganese

Thomas Prell

Vice President

fischer Canada Inc., Stainless Steel Tubing Division.

Certification: Planner

As of December 21, 2012, I, Harvey Watson certify that I am familiar with the processes at fischer Stainless Steel Tubing 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 31, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Date

Chromium, Nickel, and Manganese

Harvey Watson_

Air Quality Specialist

R.J. Burnside & Associates Limited Planner License No.: TSRP0156 Harvey.watson@riburnside.com

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This summary accurately reflects the Toxics Reduction Plan for chromium, nickel and manganese dated December 31, 2012.

fischer has been identifying and implementing programs that reduce the amount of toxics emitted to the natural environment on a continual basis for over five (5) years. In the last five (5) years, fischer has implemented four scrap reduction programs that have each significantly reduced the amount of scrap and therefor decreased their use at the facility. In addition, fischer has also installed additional end-of-pipe abatement equipment to capture emissions that cannot be reduced.