SASKATOON
220 3rd Avenue South,
Suite 413,
Saskatoon, Saskatchewan
S7K 1M1
T: 306.343.5500
TF: 1.866.919.8899
F: 306.343.3601

REGINA
369 Park Street,
Regina, Saskatchewan
S4N 5B2
T: 306.522.6100
TF: 1.866.919.1861
F: 306.522.6101

WINNIPEG
300 - 1600 Ness Avenue,
Madison Square
Winnipeg, Manitoba
R3J 3W7
T: 204.783.1276
TF: 1.866.919.4531
F: 204.478.4940

LONDON
700 Richmond Street,
Suite 307,
London, Ontario
N6A 5C7
T: 519.452.7700
TF: 1.866.919.4531
F: 519.452.1712

OTTAWA
5310 Canotek Road,
Unit 30,
Ottawa, Ontario
K1J 9N5
T: 613.824.8900
TF: 1.866.919.4530
F: 613.824.8901

IQALUIT
P.O. Box 957,
Iqaluit, Nunavut
X0A 0H0
T: 867.979.3300
TF: 1.866.919.4533
F: 867.979.3302

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY FOR HYDROCHLORIC ACID

Sivaco Ontario,
330 Thomas Street
Ingersoll Ontario N5C 3K5

December 20, 2012

Table of Contents

1 General Information

1.1 Basic Facility Information

Toxic Substance Information		
Name of Substance	Hydrochloric Acid	
CAS # of Substance (if applicable):	7647-01-0	
Facility Identification and Site Address		
Company Name	SIVACO Ontario	
Facility Address	Physical Address: 330 Thomas Street, Ingersoll Ontario, N5C 3K5	Mailing Address: 330 Thomas Street, Ingersoll Ontario, N5C 3K5
Spatial Coordinates of Facility	17N 4763628 509188 *Expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum.*	
Number of Employees	81 *Number of full time employee equivalents*	
NPRI ID	3032	
Parent Company Information *(if applicable)*		
Parent Company Name	SIVACO Wire Group 2004 L.P.	
Parent Company Address	Physical Address: 1040 Country Road 17 C/O IRM LOriginal Ontario K0B 1K0	Mailing Address (if different): 700 Ouelette C/O Infasco Marieville Quebec J3M 1P6
Facility Owner Information		
Owner of the Facility		
Address of Owner	Physical Address:	Mailing Address (if different):
Facility Operator Information		
Operator of the Facility	*(if same as owner please check box)* □	
Address of Operator	Physical Address:	Mailing Address (if different):
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	33 - manufacturing	
4 Digit NAICS Code	3328 – metal coating, engraving, heat treating and allied services	

1.2 Contact Information

Company Contact Information		
Facility Public Contact	Name:	Lawerence Pye
	Email:	pye@sivaco.com
	Phone:	519-485-4150
	Fax:	519-485-3039
	Contact Address:	330 Thomas Street, Ingersoll Ontario, N5C 3K5
Planner Contact Information		
Person Responsible for Making Recommendations **Person Responsible for Plan Certification**	Name:	Eric Shilts
	License Number	TSRP0083
	Email:	eric@concentriceng.com
	Phone:	519-452-7700
	Fax:	519-452-1712
	Contact Address:	Suite 307 700 Richmond Street London Ontario N6A 5C7

2 Statement of Intent

2.1 Statement of Intent to Reduce

Hydrochloric acid is currently used by SIVACO Ontario. This facility does not create hydrochloric acid and therefore this plan will not address reducing its creation.

While SIVACO Ontario does not intend to reduce its use of hydrochloric acid, it will take proactive measures to reduce the risk of hydrochloric acid releases.

SIVACO Ontario is committed to playing a leadership role in protecting the environment. This commitment is exemplified through SIVACO Ontario's long history of environmental stewardship, including voluntarily undergoing major process modifications to reduce the use of hydrocholric acid at their facility by approximately 77% between 2009 and 2011 (i.e. prior to the MOE's mandate of toxic reduction planning).

3 Objectives and Targets

All employees at SIVACO Ontario will be involved in the reduction of toxic substances used and released at SIVACO Ontario. SIVACO Ontario is committed to implementing options (which were identified as a

result of this planning exercise) which will provide a proactive approach to toxics reduction at the facility. The goal is to implement these proactive reduction options through spill and leak prevention (standard operating procedure review and revision) and improved training record keeping.

SIVACO Ontario will continue to monitor advancements in technology which may result in the future reductions of hydrocholric acid at the facility.

4 Description of Why Substance is Used

Hydrochloric acid is used for pH control purposes in wastewater treatment at SIVACO Ontario.

5 Options to be Implemented

5.1 List of Options to be Implemented

SIVACO Ontario intends to implement the sole option which was found to be technically and economically feasible for the reduction of hydrochloric acid at its facility:

Review (and revise as necessary) current operating practices (and associated standard operating procedures) involving hydrochloric acid onsite and improve training record keeping. This option is primarily related to the spills and leaks prevention category.

5.2 Estimated Reductions and Associated Timeline

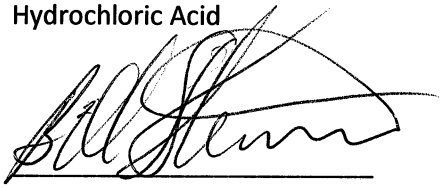
SIVACO Ontario plans to implement the option to review (and revise as necessary) current operating practices (and associated standard operating procedures) involving hydrochloric acid and improve record keeping of personnel training within a year. As a result of planning exercises related to the Toxic Reduction Act and associated Regulation SIVACO was able to identify this option as a means of providing a proactive approach to minimizing the risk of future potential releases of hydrochloric acid. Implementing this proactive option will yield anticipated reductions in release of hydrochloric acid of approximately 0.01%. This exemplifies SIVACO Ontario's commitment to continued leadership role in protecting the environment.

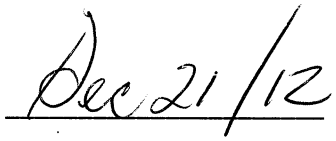
6 Certifications

6.1 Copy of Certification by Highest Ranking Employee

As of December 20, 2012 I, Bill Stevens 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.

Hydrochloric Acid



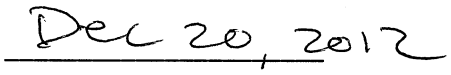


Highest Ranking Employee Date

6.2 Copy of Certification by Toxic Substance Reduction Planner

As of December 20, 2012, I, Eric Shilts certify that I am familiar with the processes at SIVACO Ontario 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 20, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Hydrochloric Acid



Toxic Substance Reduction Planner Date

7 Statement

The plan summary for hydrochloric acid accurately reflects the toxic substance reduction plan for hydrochloric acid.