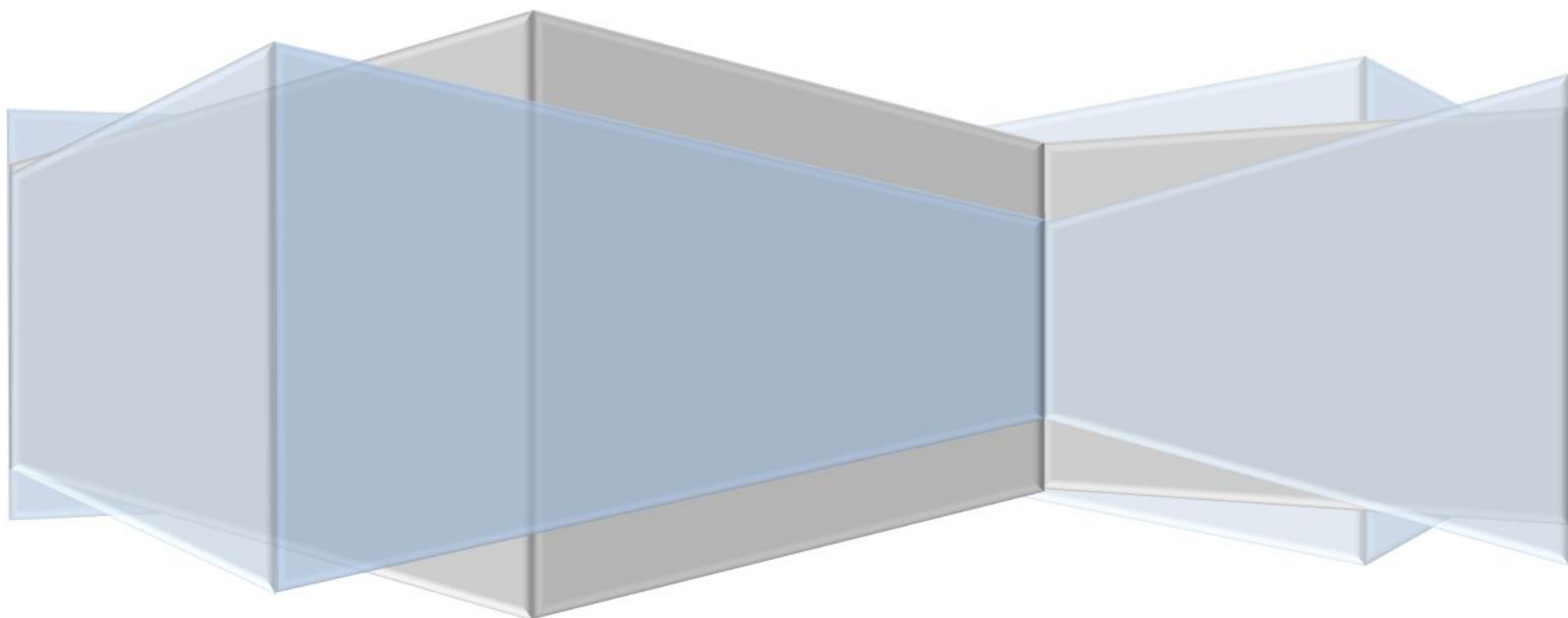


Cambridge Brass Inc.

Toxic Substance Reduction Plan Summary

December 21, 2012



Facility Information

Name & CAS # of Substance	Copper	7440-50-8
	Nickel	7440-02-0
	Zinc	7440-66-6
Facility Identification and Site Address		
Company Name	Cambridge Brass Inc.	
Facility Name	Cambridge Brass	
Facility Address	Physical Address:	Mailing Address: (if different)
	140 Orion Place Cambridge, ON N1R 5V1	
Spatial Coordination of Facility	Zone 17 Easting: 558201 m Northing: 4802331 m	
Number of Employees	112	
NPRI ID	4475	
Ontario MOE ID Number	8360	
Parent Company (PC) Information		
PC Name & Address	NA	
Percent Ownership for each PC		
Business Number for PC	893556563	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	33 Manufacturing	
4 Digit NAICS Code	3329 – Other Fabricated Metal Product Manufacturing	
6 Digit NAICS Code	332910 – Metal Valve Manufacturing	
Company Contact Information		
Facility Public Contact, Technical Contact, and Plan Co-coordinator	Ed Hesselink	<i>Same as Facility address</i>
	Director of Operations	
	Phone: (519) 621-5520 ext.203	
	ehesselink@cbrass.com	
Highest Ranking Employee Planner Information:	Pat Werby	<i>Same as Facility address</i>
	President	
	Phone: (519) 621-5520 ext.223	
	pwerby@cbrass.com	
Planner Responsible for Making Recommendations	Erik Martinez, P.Eng.	Conestoga-Rovers & Associates 651 Colby Drive Waterloo, ON N2V 1C2
	Environmental Consultant	
	Planner License No. TSRP0005	
	Phone: (519) 884-0510 ext. 2342	
	emartinez@craworld.com	

Plan Summary

Cambridge Brass Inc. is a foundry and machining operation that produces valves and fittings for municipal water systems as well as machined castings for OEM customers.

Although Zinc, Nickel, and Copper are base components of the products that Cambridge Brass produces and sells, Cambridge Brass Inc. intends to reduce the each of these metals as a percentage of its ongoing production and sales.

Cambridge Brass Inc. intends to reduce the amount of metal melted and used in our process / product as a percentage of sales by 1% over the next five years. This will be achieved through the redesign of some of our castings to reduce the amount of brass content.

Cambridge Brass Inc. also intends to reduce the amount of zinc used as a percentage of total metal melted and used in our process / product by 10% over the next five years. This will be achieved through the transition to a different raw material over the next two years.

Cambridge Brass is committed to ensure that our manufacturing process are completed in the most responsible and efficient manner.

Cambridge Brass fully expects that the initiatives it plans to undertake will provide the reductions amounts that are indicated within our Plan.

Statement of Intent

Cambridge Brass Inc. intends to reduce the amount copper, zinc, and nickel as a percentage of its ongoing production and sales. However, since copper, zinc, and nickel that are key components of the base material specified for our finished product, reducing the overall use of these does not correlate with the growth of our business. Copper, zinc and nickel are not created at the facility and thus this plan will not address reducing their creation. Cambridge Brass is committed to ensure that our manufacturing process are completed in the most responsible and efficient manner.

Objectives

- 1) Cambridge Brass Inc. intends to reduce the amount of metal melted and used in our process / product as a percentage of sales by 1% over the next five years. This will be achieved through the redesign of some of our castings to reduce the amount of brass content.
- 2) Cambridge Brass Inc. intends to reduce the amount of zinc used as a percentage of total metal melted and used in our process / product by 10% over the next five years. This will be achieved through the transition to a different raw material over the next two years.
- 3) Cambridge Brass Inc. will continue to investigate and implement methods to reduce the potential emissions of and promote recycling of copper, zinc, and nickel.

Implementation Plan of Reduction Opportunities

Steps -

Expected Completion -

Material Reduction - Casting Design Modifications

- | | |
|-------------------------------|---------------------|
| 1) Identify Opportunities | Jan 2013 - Dec 2014 |
| 2) Design Changes | March 2013 - 14 |
| 3) Tooling Development | May 2013 - 14 |
| 4) Production and QA Sampling | June 2013 -14 |
| 5) Project Completion | Sept 2015 |

Material Reformation – No Lead Conversion – C83600 to C89833

- | | |
|-------------------------------------|-----------|
| 1) Switch of Low Volume FG | Nov 2012 |
| 2) Switch of Medium Volume FG + WIP | July 2013 |
| 3) Switch of High Volume FG + WIP | Sept 2013 |
| 4) Project Completion | Jan 2014 |

On-Site Recycling – Briquette Program

- | | |
|--|-----------|
| 1) Review process and optimize | Dec 2012 |
| 2) Expand briquetting Volume (Leaded) | June 2013 |
| 3) Expand Briquetting Volume (No-Lead) | Jan 2014 |

Improve Planning Capabilities – Lean Manufacturing

- | | |
|--|------------|
| 1) Convert NL product to Kan-Ban system | Dec 2012 |
| 2) Implement ABC planning system | Jan 2013 |
| 3) Purchase Containers for Smaller Prod. Lot Sizes | March 2013 |
| 4) Implement Smaller Prod. Lot Sizes | May 2013 |

Process Improvement - Magma Software

- | | |
|---------------------------------------|------------|
| 1) Cost justification and AR approval | March 2012 |
| 2) Purchase Software | June 2013 |
| 3) Application Training | Sept 2013 |
| 4) Utilization of Software | Ongoing |

Certification

As of December 21, 2012, I, Erik Martinez certify that I am familiar with the processes at Cambridge Brass 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 18, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

[Nickel]

[Copper]

[Zinc]



Erik Martinez, P.Eng.

Toxic Substance Reduction Planner

Licence No. TSRP0005

Date - Dec 21, 2012

As of December 21, 2012, I, Pat Werby, 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.

[Nickel]

[Copper]

[Zinc]



Pat Werby, President, Cambridge Brass Inc.

Date - 12/21/12