Appendix E TRA Plan Summary

Basic Facility Information		
Name & CAS # of Substance	Methyl Ethyl Ketone Methyl Isobutyl Ketone Toluene Xylene	78-93-3 108-10-1 108-88-3 1330-20-7
Substances for which other Plans have been prepared	Cadmium (and its compounds) Hexavalent Chromium (and its compounds)	NA-03 NA-19
Facility Identification and Site Address		
Company Name	Southwest United Canada Inc.	
Facility Name	Advanced Processing Inc. (API)	
Facility Address	**Physical Address:**	**Mailing Address: (if different)**
	8201 Keele Street, Unit 9 Concord, Ontario L4K 1Z4	
Spatial Coordination of Facility	620495.72 m Easterly 4851960.65 m Northerly; Zone 17	
Number of Employees	59	
NPRI ID	11176	
Ontario MOECC ID Number		
Parent Company (PC) Information		
PC Name & Address	Southwest United Canada Inc. 8201 Keele Street, Unit 9 Concord, Ontario L4K 1Z4	
Percent Ownership for each PC	100%	
Business Number for PC	123219800	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	33 – Manufacturing	
4 Digit NAICS Code	3328 – Other Wood Product Manufacturing	
6 Digit NAICS Code	332810 – Coating, Engraving, Heat Treating, and Allied Activities	

Company Contact Information		
Facility Public Contact	Steve Little General Manager slittle@swunitedcanada.com Phone: (905) 738-9225	Same address as facility
Facility Technical Contact	Steve Little General Manager slittle@swunitedcanada.com Phone: (905) 738-9225	Same address as facility
Company Coordinator Contact	Steve Little General Manager slittle@swunitedcanada.com Phone: (905) 738-9225	Same address as facility
Person who Prepared the Plan: (if different from the Coordinator)	Jessica Cassidy, B.A.Sc. Environmental Consultant jessica.cassidy@ghd.com Phone: (519) 884-0510 x2274	GHD 651 Colby Drive Waterloo, Ontario N2V 1C2
Highest Ranking Employee	Steve Little General Manager slittle@swunitedcanada.com Phone: (905) 738-9225	Same address as facility
Planner Information:		
Planner Responsible for Making Recommendations	Erik Martinez, P. Eng. Environmental Consultant Planner License No. TSRP0005 erik.martinez@ghd.com Phone: (519) 884-0510 x2342	GHD 651 Colby Drive Waterloo, Ontario N2V 1C2
Planner Responsible for Certification	Erik Martinez, P. Eng. Environmental Consultant Planner License No. TSRP0005 erik.martinez@ghd.com Phone: (519) 884-0510 x2342	

Toxic Reduction Policy Statement of Intent

Southwest United Canada Inc. – API Division (API) is committed to playing a leadership role in protecting the environment. API does not intend to reduce the use or emissions to air of the reportable toxic substances. The substances are not created at the Facility, therefore, this report will not address reducing their creation. Whenever feasible, Southwest will reduce the use and releases of all reportable toxic substances in compliance with all Federal and Provincial Regulations.

Reduction Objectives

API prides itself on technological innovation in order to produce high quality plated and aerospace components in an environmentally responsible manner. The objective of this plan is to identify and evaluate the technical and economic feasibility of potential toxic reduction options to determine which, if any, are viable for implementation at this time. API was unable to identify any reduction options; therefore, there is no reduction objective in this plan.

Description of Facility

The Facility's operations involve chromic acid anodizing, cadmium electroplating, chemical film and passivation and painting services for the Canadian Aerospace Industry.

The primary North American Industry Classification System (NAICS) Code that applies to this Facility is 332810 – "Coating, Engraving, Heat Treating and Allied Activities".

Toxic Substance Reduction Options

After looking into the seven categories of toxic substance reduction options, no options were identified. Explanations are provided in the table below to detail why an option could not be identified in each category.

Toxic Substance Reduction Category	Option: Identification and Description
1. Materials or feedstock substitution	**No option identified:** the toxic substances are used as a solvent in paint, and as a solvent degreaser on parts. No reduction options were identified in this category that would result in the reduction in the use of the toxic substances.
2. Product design or reformulation	**No option identified:** The sources at Southwest that are responsible for the use of the toxic substances are not directly related to the formulation of the final product. Therefore, no possible options were identified in this category that would result in a reduction in the use of the toxic substances.
3. Equipment or Process Modification	**No option identified:** Equipment or process modifications would not reduce the use of toxic substances. Therefore, no possible options were identified in this category that would result in a reduction in the use of toxic substances.
4. Spill and Leak prevention	**No option identified:** Preventative maintenance is carried out periodically to test for spills or leaks. Therefore, no possible reduction options were identified in this category that would result in a reduction in the use of the toxic substances.
5. On-site reuse or recycling	**No option identified:** There are no opportunities to re-use any solvent fumes collected at the Facility. Therefore, no possible options were identified in this category that would result in a reduction in the use of the toxic substances.
6. Improve inventory management or purchasing techniques	**No option identified:** All purchased materials are used within the process. Therefore, no possible reduction options were identified in this category that would result in a reduction in the use of toxic substances.
7. Training or improved operating practices	**No option identified:** Employees are trained on each piece of machinery, and the requirements for every part that the Facility produces. Work instruction and quality control documents are posted at every work station. Employees are trained on any changes or updates to the production process. Therefore, no possible options were identified in this category that would result in a reduction in the use of toxic substances.

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for the use and air emissions of methyl ethyl ketone, methyl isobutyl ketone, toluene, and xylene.

Certification by Highest Ranking Employee

Attached.

Certification by Licensed Planner

Attached.

2. Plan Certifications

2.1 Certification by Highest Ranking Employee

As of April 24, 2017, I, Steve Little, 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.

[Methyl Ethyl Ketone]
[Methyl Isobutyl Ketone]
[Toluene]
[Xyene]

Steve Little
General Manager

Apr 25/17
Date

As of April 24, 2017, I, Erik Martinez certify that I am familiar with the processes at Rentech 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 April 24, 2017 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

[Methyl Ethyl Ketone]
[Methyl Isobutyl Ketone]
[Toluene]
[Xyene]

Erik Martinez, P. Eng.
Toxic Substance Reduction Planner

License No. TSRP0005

April 25/17
Date