

Appendix A

TRA Plan Summary – Copper

Basic Facility Information		
Name & CAS # of Substance	Copper	7440-50-8
Other Substances for which a TRA Plan was completed	Manganese	7439-96-5
	Lead	7439-92-1
	Chromium	7440-47-3
	Nickel	7440-02-0
Facility Identification and Site Address		
Company Name	Reaction Distributing Inc.	
Facility Name		
Facility Address	Physical Address: 95 Woodworth Avenue St. Thomas, ON N5P 3J9	Mailing Address: 19 Brock Street Ajax, ON L1S 1S9
Spatial Coordination of Facility		
Number of Employees	19	
NPRI ID	11846	
Ontario MOECC ID Number	ON2655100	
Parent Company (PC) Information		
PC Name & Address	Reaction Holdings Inc.	
Percent Ownership for each PC	44 Spiers Crescent Ajax, ON L1S 6Y7 100 percent	
Business Number for PC	867701674RT	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	33 Manufacturing	
4 Digit NAICS Code	3323, 3324, 3339	
6 Digit NAICS Code	332319, 332439, 333999	
Company Contact Information		
Facility Public Contact	John Neufeld Phone: (519) 633-6060 x223	Same address as facility
Facility Technical Contact	Same as Public Contact	Same address as facility
Company Coordinator Contact	Larry Vine President lvine@balers.com Phone: (905) 426-6442 x222	19 Brock St. Ajax, ON L1S 1S9
Person who Prepared the Plan: (if different from the Coordinator)	Gavin Moore Environmental Consultant Gavin.moore@ghd.com Phone: (519) 884-0510 x2277	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
Highest Ranking Employee	Larry Vine President	Same address as mailing address

Company Contact Information		
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 Limited 651 Colby Drive Waterloo, ON N2V 1C2
Planner Responsible for Certification	(Same as planner responsible for making recommendations)	

Toxic Reduction Policy Statement of Intent

Reaction Distributing Inc. (Reaction Distributing) is currently using copper in six processes. The Facility does not intend to reduce the use of this toxic substance. Reaction Distributing does not create copper; therefore, this plan will not address reducing the creation of this substance. Reaction Distributing is committed to playing a leadership role in protecting the environment. Whenever feasible, we will reduce the use and releases of copper in compliance with all Federal and Provincial Regulations.

Reduction Objectives

Reaction Distributing was unable to identify any reduction options; therefore, there is no reduction objective in this plan.

Description of Facility

Reaction Distributing is a Canadian based steel fabricator that specializes in custom designed, solid waste handling systems for retail, commercial, institutional, industrial and municipal sectors.

The primary North American Industry Classification System (NAICS) Code that applies to this Facility is 332319 – Other Plate Work and Fabricated Structural Product Manufacturing.

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	Reaction Distributing is required to order specific steel products to meet their client specifications. The facility machines the parts that have been specified and assembles these parts to form the final products that are shipped to their clients. Reaction Distributing does not have the ability to change the feedstock material or its composition. Therefore, no possible reduction options for material or feedstock substitutions were identified.
2) Product design or reformulation	No option identified: The products are machined and assembled according to customer specifications. The part dimensions and specifications are specified by the customers and Reaction Distributing does not have ability to redesign the finished products. Therefore, no possible reduction options for product redesign or reformulation were identified.

Toxic Substance Reduction Category	Option: Identification and Description
3) Equipment or Process Modification	No option identified: The current equipment used for the different process stages at the facility are in place to machine large trash bins and industrial waste compactors that meet the specifications of the clients. There are no potential equipment replacements or process modifications that would provide a potential reduction in the amount of toxic substances used at the facility. Therefore, no possible reduction options for equipment or process modifications were identified.
4) Spill and Leak prevention	No option identified: The materials used at Reaction Distributing to produce the final products that contain the toxic substances consist of steel and welding wire. These products do not pose an issue for spills or leaks. Therefore, no possible reduction options for spill and leak prevention were identified.
5) On-site reuse or recycling	No option identified: Reaction Distributing reuses excess steel that is a by-product from the cutting machines to be used for other parts as much as possible. All scrap material that cannot be used for any parts being machined are then recycled off site. Due to the constraints of ordering steel material at certain sizes, Reaction Distributing is forced to produce scrap material and so there are no options available to Reaction Distributing to limit their quantity of scrap material. Therefore, no possible reduction options for on-site reuse and recycling were identified.
6) Improve inventory management or purchasing techniques	Reaction Distributing tracks all received material at the Facility and keeps a minimal amount of steel on site to be machined into the final products. The raw materials purchased are selected according to the grade and dimensions as specified by the clients. The facility's inventory is organized by material type and all potentially reusable steel is quantified. Reaction Distributing cannot make any significant modifications to their current inventory practices. Therefore, no possible reduction options for improved inventory management/purchasing techniques were identified.
7) Training or improved operating practices	No option identified No options of reduction for this category could be 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 of parts. Reaction Distributing conducts continuous improvement meetings and production meetings to ensure issues are dealt with and communicated as soon as possible to ensure the quality of parts are in conformance with the customer demands.

Plan Summary Statement

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

Certification by Highest Ranking Employee

Attached.

Certification by Licensed Planner

Attached.