

## **TOXIC REDUCTION POLICY STATEMENT OF INTENT**

Essex Group Canada Inc. (Essex) is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use, creation and discharge of toxics in full compliance with all federal and provincial regulations. Our employees are encouraged to participate in all types of toxic substance reduction activities. Toxic substance reduction will be an ongoing effort at Essex, and we will continue to monitor advancements in magnet wire manufacturing to ensure that options that are both technologically and financially viable are implemented at our facility.

## **DESCRIPTION OF SUBSTANCE**

Magnet copper wire is produced at the facility. Copper rod is brought to the facility and processed to produce various enamelled, coated and wrapped magnetic wire. Copper is the key component of the final product.

Copper is a valuable material. Programs in place at the plant recover nearly 100% of any waste copper. Off-site copper recycling is not considered a reduction option of the use and creation of MOE Toxic substances under the Toxic Reduction Act.

## **REDUCTION OBJECTIVES**

All employees at Essex Group Canada Inc. are involved in the reduction of toxic substance use, creation and releases. Our goal is to reduce the use of copper where technically and economically feasible.

No current options were identified that are technically feasible.

## **PLAN SUMMARY STATEMENT**

This plan summary accurately reflects the content of the toxic substance reduction plan for copper and its compounds, prepared on behalf of Essex Group Canada Inc. dated 19 December 2012.

Essex also has toxic reduction plans for: phenol, 1,2,4-trimethylbenzene, n-methyl-2-pyrrolidene, light aromatic solvent naphtha, cresol, Stoddard solvent, glycol ethers and xylene. These are all components of solvents, enamels and varnishes used at the plant.

## BASIC FACILITY INFORMATION

Company Name: Essex Group Canada Inc.

Highest Ranking Employee: David L. MarcAurele  
Plant Manager  
(519) 428-3900  
[David.Marcaurele2@superioressex.com](mailto:David.Marcaurele2@superioressex.com)

Primary Technical Contact: Roger Doucet  
Facilities Manager  
(519) 428-3922  
[Roger.Doucet@superioressex.com](mailto:Roger.Doucet@superioressex.com)

Secondary Technical Contact: Eric Trauner  
Regulatory Compliance Manager  
(260) 461-5110  
[Eric.Trauner@superioressex.com](mailto:Eric.Trauner@superioressex.com)

Certified Planner: Tony van der Vooren P.Eng, Ph.D, QEP  
License Number TSRP0051  
Senior Environmental Consultant  
Amec Americas Limited  
905-403-3536  
[tony.vandervooren@amec.com](mailto:tony.vandervooren@amec.com)

Parent Company:  
(100% Ownership) Essex Group, Inc.  
1601 Wall Street  
Fort Wayne, Indiana 46802 USA

Facility Address: 19-20 Gilbertson, Simcoe, ON N3Y 4L5

Business Number: 886486489

Location (of main gate) Zone 17  
Easting: 556990  
Northing: 4744427

The facility's NPRI ID: 0000000953

In 2011, Essex Group's Simcoe operation employed about 97 full time employees.

The NAICS codes applicable to the facility are:

- 33 - Manufacturing
- 335 - Electrical Equipment, Appliance and Component Manufacturing
- 335920 - Communication and Energy Wire and Cable Manufacturing (Can)

**CERTIFICATION OF HIGHEST RANKING EMPLOYEE**

As of 19 December 2012, I, David L. MarcAurele, 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.

Copper and its compounds



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David L. MarcAurele  
Plant Manager  
Essex Group Canada Inc.

**CERTIFICATION OF LICENSED PLANNER**

As of 19 December 2012, I, Tony van der Vooren certify that I am familiar with the processes at Essex Group Canada Inc. 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 19 December 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Copper and its compounds



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Tony van der Vooren P.Eng, Ph.D, QEP  
Licensed Toxic Reduction Planner (Ontario): License Number TSRP0051  
Senior Environmental Consultant  
Amec Americas Limited

## **TOXIC REDUCTION POLICY STATEMENT OF INTENT**

Essex Group Canada Inc. (Essex) is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use, creation and discharge of toxics in full compliance with all federal and provincial regulations. Our employees are encouraged to participate in all types of toxic substance reduction activities. Toxic substance reduction will be an ongoing effort at Essex Group Canada Inc., and we will continue to monitor advancements in magnet wire manufacturing to ensure that options that are both technologically and financially viable are implemented at our facility.

## **DESCRIPTION OF SUBSTANCE**

Copper and aluminum wire is coated with insulating enamels containing various volatile organic compounds including dimethyl phenol. The enamels are received and distributed to the vertical and horizontal enamel application machines as required and cured at slightly elevated temperatures. Both the enamel applicators and curing ovens are vented to the atmosphere through a catalytic control unit. The 95% catalytic destruction efficiency is not considered a reduction option of the use and creation of MOE Toxic substances under the Toxic Reduction Act.

Solvents containing phenol, 1,2,4-trimethylbenzene, n-methyl-2-pyrrolidene, light aromatic solvent naphtha, cresol, stoddard solvent, glycol ethers, xylene and dimethyl phenol are used to reduce viscosity of enamels and clean the equipment and lines between the use of different enamels. Spent solvent is collected and shipped off-site as hazardous waste liquid.

## **REDUCTION OBJECTIVES**

All employees at Essex Group Canada Inc. are involved in the reduction of toxic substance use, creation and releases. Our goal is to reduce the use of copper where technically and economically feasible.

No current options were identified that are technically feasible.

## **PLAN SUMMARY STATEMENT**

This plan summary accurately reflects the content of the toxic substance reduction plan for dimethyl phenol.

Essex prepared a toxic reduction plan for phenol, 1,2,4-trimethylbenzene, n-methyl-2-pyrrolidene, light aromatic solvent naphtha, cresol, Stoddard solvent, glycol ethers and xylene, and submitted it December 2011 as well as copper and its compounds, also submitted December 2011, which is the key component of the magnet copper wire produced at the facility.

## BASIC FACILITY INFORMATION

Company Name: Essex Group Canada Inc.  
19-20 Gilbertson Drive, Simcoe, Ontario, N3Y 4L5

Highest Ranking Employee: Jared Rowntree  
Plant Manager  
(519) 428-3900  
[Jared.Rowntree@superioressex.com](mailto:Jared.Rowntree@superioressex.com)

Technical Contact: Robert Distler  
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Certified Planner: Beth Rhyno, P.Eng.  
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SW Compliance Lead  
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Tony van der Vooren P.Eng, Ph.D, QEP  
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905-403-3536  
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Business Number: 886486489

Location (of main gate) Zone 17  
Easting: 556990  
Northing: 4744427

The facility's NPRI ID: 0000000953

In 2011, Essex Group's Simcoe operation employed about 97 full time employees.

The NAICS codes applicable to the facility are:

33	- Manufacturing
335	- Electrical Equipment, Appliance and Component Manufacturing
335920	- Communication and Energy Wire and Cable Manufacturing (Can)

**CERTIFICATION OF HIGHEST RANKING EMPLOYEE**

As of 31 December 2014, I, Jared Rowntree, 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.

1300-71-6      Dimethyl phenol



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Jared Rowntree  
Plant Manager  
Essex Group Canada Inc.

**CERTIFICATION OF LICENSED PLANNER**

As of 31 December 2014, I, Beth Rhyno certify that I am familiar with the processes at Essex Group Canada 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 [insert version date] and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

1300-71-6      Dimethyl phenol



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Beth Rhyno, P.Eng,  
Licensed Toxic Reduction Planner (Ontario): License Number TSRP0273  
SW Compliance Lead  
Amec Foster Wheeler Environment & Infrastructure

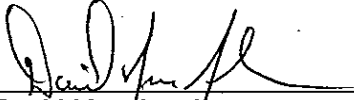
**2012 – Enamels, Thinners, Cleaners: VOC Substance Certification**

**CERTIFICATION OF HIGHEST RANKING EMPLOYEE**

As of 17 December 2012, I, David MarcAurele, 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.

1319-77-3      Cresol  
8052-41-3      Stoddard Solvent  
                         Glycol Ethers

1330-20-7	Xylene
872-50-4	n-Methyl-2-pyrrolidone
108-95-2	Phenol
95-63-6	1,2,4-Trimethylbenzene
64742-95-6	Light Aromatic Solvent Naphtha

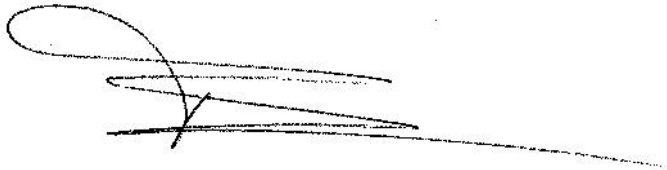


David Marc Aurele  
Plant Manager  
Essex Group Canada Inc.

### **CERTIFICATION OF LICENSED PLANNER**

As of 17 December 2012, I, Tony van der Vooren certify that I am familiar with the processes at Essex Group Canada 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 [insert version date] and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

1319-77-3	Cresol
8052-41-3	Stoddard Solvent Glycol Ethers
1330-20-7	Xylene
872-50-4	n-Methyl-2-pyrrolidone
108-95-2	Phenol
95-63-6	1,2,4-Trimethylbenzene
64742-95-6	Light Aromatic Solvent Naphtha



Tony van der Vooren P.Eng, Ph.D, QEP  
Licensed Toxic Reduction Planner (Ontario): License Number TSRP0051  
Senior Environmental Consultant  
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