

## 1. General Information

Facility Information		
Company Name	Héroux-Devtek Landing Gear Division	
Facility Address	1665 Highland Road West, Kitchener, ON N2N 3K5	
Site Coordinates (main entrance of site)	17 T 535577 mE 4807619 mN	
NPRI ID	7643	
MOE ID	-	
Number of Full-Time Employees in 2015	162	
2-Digit NAICS Code	33 – Manufacturing	
4- Digit NAICS Code	3366	
6-Digit NAICS Code	336410 – Aerospace Product and Parts Manufacturing	
Substance Information		
Substance Name	CAS #	
Chromium (and its compounds)	NA – 04	
Manganese (and its compounds)	NA – 09	
Nickel (and its compounds)	NA – 11	
Arsenic (and its compounds)	NA – 02	
Cadmium (and its compounds)	NA – 03	
Selenium (and its compounds)	NA – 12	
Facility Contact Information		
Public Contact	Mr. Terry Darbyson Maintenance Supervisor Phone #: 519-576-8910 x2739 Fax #: 519-576-5119	tdarbyson@herouxdevtek.com 1665 Highland Road West Kitchener, ON N2N 3K5

## 2. Toxic Substance Accounting Summary

Facility-wide Amounts of Toxic Substances Reported for 2015:

Substance Name	Used	Created	Contained In Product	Release to Air	Disposed / Recycled
Chromium (and its compounds)	10 to 100	0	1 to 10	0 to 1	10 to 100
Manganese (and its compounds)	10 to 100	0	1 to 10	0 to 1	10 to 100
Nickel (and its compounds)	10 to 100	0	1 to 10	0 to 1	10 to 100
Arsenic (and its compounds)	10 to 100	0	1 to 10	0 to 1	1 to 10
Cadmium (and its compounds)	10 to 100	0	1 to 10	0 to 1	1 to 10
Selenium (and its compounds)	10 to 100	0	1 to 10	0 to 1	1 to 10

NOTE: Units are expressed in tonnes, unless otherwise indicated. '--' indicates not applicable.

## 3. Quantification Comparison to Previous Year

### 3.1 Chromium (and its compounds)

	Unit	2015	2014	Change (Unit)	Change (%)	Rationale for Change
Used	Tonnes	10 to 100	10 to 100	↑ 1 to 10	↑ 46.5%	Increased material usage / production.
Created	Tonnes	0	0	0	0	--
Contained In Product	Tonnes	1 to 10	0 to 1	↑ 1 to 10	↑ 833.1%	Increased material usage / production.
Release to Air	Tonnes	0	0	0	0	No significant change
Release to Water	--	--	--	--	--	--
On-site Disposal	--	--	--	--	--	--
Transferred for Disposal	--	--	--	--	--	--
Transferred for Recycling	Tonnes	10 to 100	10 to 100	↑ 1 to 10	↑ 6.8%	No significant change

### 3.2 Manganese (and its compounds)

	Unit	2015	2014	Change (Unit)	Change (%)	Rationale for Change
Used	Tonnes	10 to 100	10 to 100	↑ 1 to 10	↑ 46.5%	Increased material usage / production.
Created	Tonnes	0	0	0	0	No significant change.
Contained In Product	Tonnes	1 to 10	0 to 1	↑ 1 to 10	↑ 833.1%	Increased material usage / production.
Release to Air	Tonnes	0	0	0	0	No significant change.
Release to Water	--	--	--	--	--	--
On-site Disposal	--	--	--	--	--	--

Transferred for Disposal	--	--	--	--	--	--
Transferred for Recycling	Tonnes	10 to 100	10 to 100	↑ 1 to 10	↑ 6.8%	No significant change.

### 3.3 Nickel (and its compounds)

	Unit	2015	2014	Change (Unit)	Change (%)	Rationale for Change
Used	Tonnes	10 to 100	10 to 100	↑ 1 to 10	↑ 46.5%	Increased material usage / production.
Created	Tonnes	0	0	0	0	No significant change.
Contained In Product	Tonnes	1 to 10	0 to 1	↑ 1 to 10	↑ 833.1%	Increased material usage / production.
Release to Air	Tonnes	0	0	0	0	No significant change.
Release to Water	--	--	--	--	--	--
On-site Disposal	--	--	--	--	--	--
Transferred for Disposal	--	--	--	--	--	--
Transferred for Recycling	Tonnes	10 to 100	10 to 100	↑ 0 to 1	↑ 6.8%	No significant change.

### 3.4 Arsenic (and its compounds)

	Unit	2015	2014	Change (Unit)	Change (%)	Rationale for Change
Used	kg	10,000 to 100,000	1,000 to 10,000	↑ 1,000 to 10,000	↑ 46.5%	Increased material usage / production.
Created	kg	0	0	0	0	No significant change.
Contained In Product	kg	1,000 to 10,000	100 to 1,000	↑ 1,000 to 10,000	↑ 833.1%	Increased material usage / production.
Release to Air	kg	0	0	0	0	No significant change.
Release to Water	--	--	--	--	--	--
On-site Disposal	--	--	--	--	--	--
Transferred for Disposal	--	--	--	--	--	--
Transferred for Recycling	kg	1,000 to 10,000	1,000 to 10,000	↑ 100 to 1,000	↑ 6.8%	No significant change.

### 3.5 Cadmium (and its compounds)

	Unit	2015	2014	Change (Unit)	Change (%)	Rationale for Change
Used	kg	10,000 to 100,000	1,000 to 10,000	↑ 1,000 to 10,000	↑ 46.5%	Increased material usage / production.
Created	kg	0	0	0	0	No significant change.
Contained In Product	kg	1,000 to 10,000	100 to 1,000	↑ 1,000 to 10,000	↑ 829.2%	Increased material usage / production.
Release to Air	kg	0	0	0	0	No significant change.

Release to Water	--	--	--	--	--	--
On-site Disposal	--	--	--	--	--	--
Transferred for Disposal	--	--	--	--	--	--
Transferred for Recycling	kg	1,000 to 10,000	1,000 to 10,000	↑ 100 to 1,000	↑ 6.8%	No significant change.

### 3.6 Selenium (and its compounds)

	Unit	2015	2014	Change (Unit)	Change (%)	Rationale for Change
Used	kg	10,000 to 100,000	1,000 to 10,000	↑ 1,000 to 10,000	↑ 46.5%	Increased material usage / production.
Created	kg	0	0	0	0	No significant change.
Contained In Product	kg	1,000 to 10,000	100 to 1,000	↑ 1,000 to 10,000	↑ 833.1%	Increased material usage / production.
Release to Air	kg	0	0	0	0	No significant change.
Release to Water	--	--	--	--	--	--
On-site Disposal	--	--	--	--	--	--
Transferred for Disposal	--	--	--	--	--	--
Transferred for Recycling	kg	1,000 to 10,000	1,000 to 10,000	↑ 100 to 1,000	↑ 6.8%	No significant change.

## 4. Objectives

The objectives of this plan are to:

- identify potential toxic substance reduction options;
- assess the technical and economic feasibility of reduction options, if any are identified; and
- determine which options, if any, are feasible for implementation.

## 5. Progress in Implementing Plan

This section does not apply since no feasible reduction options are available for implementation at this time.

For information on on-site releases from the facility, as well as disposal and off-site recycling information please refer to National Pollutant Release Inventory's website: <http://www.ec.gc.ca/inrp-npri/>.

As of MAY 24<sup>th</sup>, 2016, I, Dan Sidhu, certify that I have read the reports on the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the information contained in the reports is factually accurate and the reports comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

*Chromium (and its compounds)*

*Nickel (and its compounds)*

*Manganese (and its compounds)*

*Arsenic (and its compounds)*

*Cadmium (and its compounds)*

*Selenium (and its compounds)*



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Dan Sidhu  
General Manager  
Héroux-Devtek Landing Gear Division