

1. General Information

| Facility Information | | |
|--|--|--|
| Company Name | Devtek Aerospace Inc. | |
| 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 | 130 | |
| 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 2016:

| 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 | 2016 | 2015 | Change (Unit) | Change (%) | Rationale for Change |
|---------------------------|--------|-----------|-----------|---------------|------------|-----------------------|
| Used | Tonnes | 10 to 100 | 10 to 100 | ↓ 0 to 1 | ↓ 2.6 | No significant change |
| Created | Tonnes | 0 | 0 | 0 | 0 | No significant change |
| Contained In Product | Tonnes | 1 to 10 | 1 to 10 | ↓ 1 to 10 | ↓ 29.8 | Decreased 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 | ↑ 9.3 | No significant change |

3.2 Manganese (and its compounds)

| | Unit | 2016 | 2015 | Change (Unit) | Change (%) | Rationale for Change |
|---------------------------|--------|-----------|-----------|---------------|------------|------------------------|
| Used | Tonnes | 10 to 100 | 10 to 100 | ↓ 0 to 1 | ↓ 2.6 | No significant change. |
| Created | Tonnes | 0 | 0 | 0 | 0 | No significant change. |
| Contained In Product | Tonnes | 1 to 10 | 1 to 10 | ↓ 1 to 10 | ↓ 29.8 | Decreased 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 | ↑ 9.3 | No significant change. |

3.3 Nickel (and its compounds)

| | Unit | 2016 | 2015 | Change (Unit) | Change (%) | Rationale for Change |
|---------------------------|--------|-----------|-----------|---------------|------------|------------------------|
| Used | Tonnes | 10 to 100 | 10 to 100 | ↓ 0 to 1 | ↓ 2.6 | No significant change. |
| Created | Tonnes | 0 | 0 | 0 | 0 | No significant change. |
| Contained In Product | Tonnes | 1 to 10 | 1 to 10 | ↓ 1 to 10 | ↓ 29.8 | Decreased 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 | ↑ 9.3 | No significant change. |

3.4 Arsenic (and its compounds)

| | Unit | 2016 | 2015 | Change (Unit) | Change (%) | Rationale for Change |
|---------------------------|------|-------------------|-------------------|----------------|------------|------------------------|
| Used | kg | 10,000 to 100,000 | 10,000 to 100,000 | ↓ 100 to 1,000 | ↓ 2.6 | No significant change. |
| Created | kg | 0 | 0 | 0 | 0 | No significant change. |
| Contained In Product | kg | 1,000 to 10,000 | 1,000 to 10,000 | ↓ 100 to 1,000 | ↓ 29.8 | Decreased 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 | ↑ 9.3 | No significant change. |

3.5 Cadmium (and its compounds)

| | Unit | 2016 | 2015 | Change (Unit) | Change (%) | Rationale for Change |
|---------------------------|------|-------------------|-------------------|----------------|------------|------------------------|
| Used | kg | 10,000 to 100,000 | 10,000 to 100,000 | ↓ 100 to 1,000 | ↓ 2.6 | No significant change. |
| Created | kg | 0 | 0 | 0 | 0 | No significant change. |
| Contained In Product | kg | 1,000 to 10,000 | 1,000 to 10,000 | ↓ 100 to 1,000 | ↓ 27.5 | Decreased 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 | ↑ 9.3 | No significant change. |

3.6 Selenium (and its compounds)

| | Unit | 2016 | 2015 | Change (Unit) | Change (%) | Rationale for Change |
|---------------------------|------|-------------------|-------------------|----------------|------------|------------------------|
| Used | kg | 10,000 to 100,000 | 10,000 to 100,000 | ↓ 100 to 1,000 | ↓ 2.6 | No significant change. |
| Created | kg | 0 | 0 | 0 | 0 | No significant change. |
| Contained In Product | kg | 1,000 to 10,000 | 1,000 to 10,000 | ↓ 100 to 1,000 | ↓ 29.8 | Decreased 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 | ↑ 9.3 | 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 11th, 2017, 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)



Dan Sidhu

General Manager

Devtek Aerospace Inc. - Héroux-Devtek Landing Gear Division