

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

Primary Technical Contact: Roger Doucet
Facilities Manager
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Secondary Technical Contact: Eric Trauner
Regulatory Compliance Manager
(260) 461-5110
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

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



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



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

Technical Contact: Robert Distler
Environmental Health and Safety Manager
(260) 461-4391
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Certified Planner: Beth Rhyno, P.Eng.
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Tony van der Vooren P.Eng, Ph.D, QEP
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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



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



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

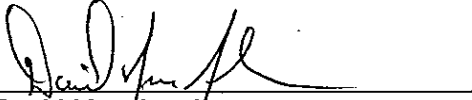
2012 – Enamels, Thinners, Cleaners: VOC Substance Certification

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

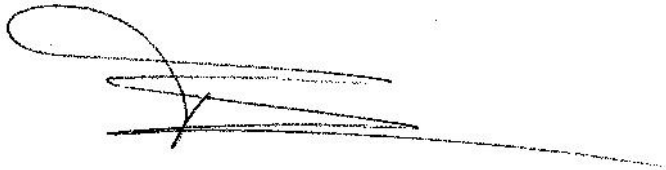


David Marc Aurele
Plant Manager
Essex Group Canada Inc.

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



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