REPORT ON TOXIC SUBSTANCE REDUCTION PLANS (JUNE 2016)

This Report on Toxic Substance Reduction Plans has been prepared in accordance with, and satisfies the requirements of Section 10 of the *Toxics Reduction Act* (TRA) and Section 27 of Ontario Regulation (O.Reg.) 455/09 for all TRA toxic substances for which Toxic Substance Reduction Plans have been prepared to date.

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This Report on Toxic Substance Reduction Plans applies to the Toxic Substance Reduction Plans for the following prescribed toxic substances: **Copper, Chromium, Manganese, Nickel, Zinc** [Per O.Reg. 455/09; "no single CAS numbers apply to these substances"]
NPRI Identification Number	NPRI ID: 010939
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	Eaton Industries (Canada) Company 610 Industrial Drive Milton, ON L9T 5C3
The number of full time employee equivalents at the facility	175
NAICS codes and the six-digit NAICS Canada code	33 – Manufacturing 3353 – Electrical Equipment Manufacturing 335315 – Switchgear and Switchboard, Relay and Industrial Control Apparatus Manufacturing
Public contact	Andreea Arangio, EHS Manager Eaton Industries (Canada) Company 610 Industrial Drive Milton, ON L9T 5C3 905-693-6002
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	UTM Zone 17T 588193 E, 4818729 N
Parent Company Information	Eaton Corporation 1111 Superior Avenue, Cleveland, Ohio, USA, 44114

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Copper*
Chromium*
Manganese*
Nickel*
Zinc*

*Per O.Reg. 455/09, "no single CAS numbers apply to these substances"

Toxic Substance Accounting Information

Refer to Appendix A: TRA Toxic Substance Quantification and Accounting Summary for the information required under s.12(1) of O.Reg.455/09.

Comparison of Toxic Substance Accounting to the Previous Calendar Year

Refer to Appendix B: Comparison of Toxic Substance Quantification and Accounting to the Previous Calendar Year for the information required by s.26(2) of O.Reg.455/09.

Changes in Quantification Methods

There were no changes made to any quantification methods since the preparation of the Toxic Substance accounting information for the previous calendar year and therefore no changes outlined in the above comparison occurred due to changes in quantification methods.

Objectives of Toxic Substance Reduction Plans

The Objectives of the Plans are as follows:

- To outline the Facility's position that no toxic substance reduction options can be identified for the Toxic Substances; and,
- Document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to each Toxic Substance covered.

Toxic Substance Reduction Options Identified in Toxic Substance Reduction Plans

As required by s.18(4) of O. Reg. 455/09 (as amended by s.9(3) of O. Reg. 214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of the Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories. This result is due mainly to the proactive approach employed by Facility personnel to material use efficiency, scrap reduction, and process optimization which has resulted in any potential reductions of toxic substance use and subsequent savings having been realized prior to this exercise.

Therefore, the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified. Facility personnel will continue to evaluate and assess future potential reduction options as they become available through the advancement of materials technology, manufacturing process and management.

Therefore the information required by s.26(2)4, s.26(2)5, and s.26(2)6 is not applicable for this Report.

Amendments to Toxic Substance Reduction Plans

No Amendments have been made to any Toxic Substance Reduction Plans.

Certification Statement

As of June 1, 2016, I certify that I have read the Report on the toxic substance reduction plans for the substances listed below and am familiar with its content and to my knowledge the information contained in the Report is factually accurate and the Report complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

Copper*

Chromium*

Manganese*

Nickel*

Zinc*

*Per O.Reg. 455/09, "no single CAS numbers apply to these substances"

Elizabeth Sanchez

Elizabeth Sanchez
Plant Manager

Dec. 12, 2016

Date

TRA Toxic Substance Quantification and Accounting Summary

The worksheets to the right of this tab were used to determine the quantities below which are reportable to the TRA and to the public in the public report.

TRA Reportable Substance	CAS No.*	Public Reportable Values (Report to Public)			
		Unit	Use	Creation	Contained in Product
Chromium	N/A-4	tonnes	>10 to 100	0	>10 to 100
Copper	N/A-6	tonnes	>100 to 1000	0	>100 to 1000
Manganese	N/A-9	tonnes	>10 to 100	0	>10 to 100
Nickel	N/A-10	tonnes	>10 to 100	0	>10 to 100
Zinc	N/A-14	tonnes	>10 to 100	0	>10 to 100

Notes:

* Substances with CAS Numbers starting with "N/A" do not have CAS Numbers in NPRI or TRA guidance. The CAS Numbers assigned to those substances are arbitrary CAS Numbers used for the purpose of this workbook.

TRA Reporting Comparison

Used

Substance	CAS No.	Reporting Units	2014	2015	% Change	Comment if Change +/- 10%
Chromium	N/A-4	tonnes	30.322	38.392	27%	Change in raw material quantity usage
Copper	N/A-6	tonnes	769.626	784.277	2%	—
Manganese	N/A-9	tonnes	40.350	50.918	26%	Change in raw material quantity usage
Nickel	N/A-10	tonnes	37.576	47.545	27%	Change in raw material quantity usage
Zinc	N/A-14	tonnes	31.813	32.023	1%	—

Created

Substance	CAS No.	Reporting Units	2014	2015	% Change	Comment if Change +/- 10%
Chromium	N/A-4	tonnes	0	0	—	—
Copper	N/A-6	tonnes	0	0	—	—
Manganese	N/A-9	tonnes	0	0	—	—
Nickel	N/A-10	tonnes	0	0	—	—
Zinc	N/A-14	tonnes	0	0	—	—

Contained in Product

Substance	CAS No.	Reporting Units	2014	2015	% Change	Comment if Change +/- 10%
Chromium	N/A-4	tonnes	30.264	30.878	2%	—[1]
Copper	N/A-6	tonnes	729.950	746.259	2%	—
Manganese	N/A-9	tonnes	40.099	40.971	2%	—[1]
Nickel	N/A-10	tonnes	37.504	38.263	2%	—[1]
Zinc	N/A-14	tonnes	31.790	18.228	-43%	Incorrect unit conversion was used in previous year when converting recycled steel scrap to tonnes, resulting in low quantities of scrap and incorrect quantities calculated as "Contained in Products". Steel scrap conversion was updated in the current report; however, only zinc has a % Change >10% because it is only present in galvanized steel and total Facility usage of galvanized steel did not increase significantly in 2015. Therefore the updated scrap conversion resulted in a higher quantity of recycled zinc and an apparent large change in the amount contained in final products.

[1] Incorrect unit conversion was used in previous year when converting recycled steel scrap to tonnes, resulting in low quantities of scrap and incorrect quantities calculated as "Contained in Products". Steel scrap conversion was updated in the current report; however, the resulting Contained in Products % Change for chromium, manganese and nickel is small because total Facility usage of non-galvanized sheet steel and aluminum alloys (which contain these substances) increased by >20% in 2015. The increased usage rates for these metals balanced the higher recycling quantities calculated and resulted in negligible change to Contained in Products.