

# Appendix B TRA Plan Summary

## Basic Facility Information

<b>Name &amp; CAS # of Substance</b>	Acetone	67-64-1
<b>Substances for which other Plans have been prepared</b>	Methanol	67-56-1
	Ethanol	64-17-5
	Total Selenium	NA-12

## Facility Identification and Site Address

<b>Company Name</b>	Raytheon Canada Limited	
<b>Facility Name</b>	Raytheon ELCAN Optical Technologies	
<b>Facility Address</b>	<b>Physical Address:</b>	<b>Mailing Address: (if different)</b>
	450 Leitz Road Midland, Ontario L4R 5B8	
<b>Spatial Coordination of Facility</b>	Easting: 589108.67 Northing: 4955704.30 Zone 17	
<b>Number of Employees</b>	805	
<b>NPRI ID</b>	7357	
<b>Ontario MOE ID Number</b>	N/A	

## Parent Company (PC) Information

<b>PC Name &amp; Address</b>	Raytheon Canada Limited 360 Albert St., Suite 1640 Ottawa, Ontario K1R 7X7	
<b>Percent Ownership for each PC</b>	100%	
<b>Business Number for PC</b>		

## Primary North American Industrial Classification System Code (NAICS)

<b>2 Digit NAICS Code</b>	31 33 – Manufacturing
<b>4 Digit NAICS Code</b>	3333 Commercial and service industry machinery manufacturing
<b>6 Digit NAICS Code</b>	333310 Commercial and service industry machinery manufacturing

## Company Contact Information

<b>Facility Public Contact</b>	Mr. Fred Hibbs, Senior Manager	Same address as facility
	<a href="mailto:fhibbs@elcan.com">fhibbs@elcan.com</a>	
	Phone: (705) 528-7179	
	Fax: (705) 528-7122	
<b>Facility Technical Contact</b>	Mr. Michael Reid, Manager Environmental Health & Safety	Same as facility address
	<a href="mailto:mreid@elcan.com">mreid@elcan.com</a>	
	Phone: (705) 528-7133	
	Fax: (705) 528-7122	
<b>Company Coordinator Contact</b>	Same as Facility Technical Contact	

<b>Person who Prepared the Plan: (if different from the Coordinator)</b>	Sean Williams	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
	<a href="mailto:Sean.Williams@ghd.com">Sean.Williams@ghd.com</a>	
	Phone: (519) 884-0510 ext. 2219	
	Fax: (519) 884-0525	
<b>Highest Ranking Employee</b>	Sean Williams	Same as facility address
	Mr. Fred Hibbs, Senior Manager	
	<a href="mailto:fhibbs@elcan.com">fhibbs@elcan.com</a>	
	Phone: (705) 528-7179	
	Fax: (705) 528-7122	
<b>Planner Information:</b>		
<b>Planner Responsible for Making Recommendations</b>	Dana Lauder	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
	Planner License No. TSRP0014	
	<a href="mailto:Dana.Lauder@ghd.com">Dana.Lauder@ghd.com</a>	
	Phone: (519) 884-0510 ext. 2299	
	Fax: (519) 884-0525	
<b>Planner Responsible for Certification</b>	(same as planner responsible for making recommendations)	

### ***Toxic Reduction Policy Statement of Intent***

Elcan is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use and discharge of acetone in full compliance with all federal and provincial regulations. After analyzing the options under each category, none were found to be technically or economically feasible and so Elcan does not intend to reduce the use of acetone at this time. Toxic substance reduction will be an ongoing effort, and we will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at our facility. Elcan does not create acetone, so this plan will not address reducing its creation.

### ***Reduction Objectives***

The objective of this Plan is to identify and evaluate a variety of toxics substance reduction options to reduce the use, disposal and release to air of acetone at the Facility. Further, this plan will determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time.

### ***Description of Facility***

Elcan manufactures opto-mechanical and electro-optical systems and subsystems for various specialty markets including projection display, medical, industrial, automotive, defence and entertainment. Raw materials received at the facility are mainly lenses, solvents and small metal components. Manufacturing processes are mainly machining, metal plating, painting and coating, optical lens manufacturing and assembly. Acetone is primarily used at the facility as a cleaning solvent, with some used as a constituent of primer and adhesive products.

The North American Industry Classification System (NAICS) Code that applies to this Facility is 333310 - Commercial and Service Industry Machinery Manufacturing.

***Toxic Substance Reduction Options***

There were no options identified that can be implemented by Elcan to reduce the use, disposals or releases of Acetone.

***Plan Summary Statement***

This plan summary accurately reflects the content of the toxic substance reduction plan for the use, disposals and releases of Acetone.

***Certification by Highest Ranking Employee***

Attached.

***Certification by Licensed Planner***

Attached.

## 2. Plan Certifications

### CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 16, 2015, I, Fred Hibbs, 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.

Acetone

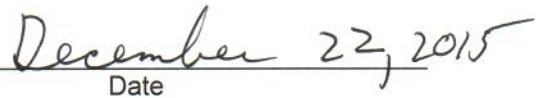
Total Selenium



Fred Hibbs

Senior Manager

Raytheon ELCAN Optical Technologies



Date

### CERTIFICATION BY LICENSED PLANNER

As of December 16, 2015, I, Dana Lauder, certify that I am familiar with the processes at ELCAN 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 December 16, 2015 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Acetone

Total Selenium



Dana Lauder, P. Eng.

Planner License # TSRP0014

GHD Limited

December 22, 2015

Date