Appendix B TRA Plan Summary

Basic	Facility	Inform	ation
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Contact

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

rano naro noon proparoa	Luianoi	04-17-5	
	Acetone	67-64-1	
Facility Identification and Site A	ddress		
Company Name	Raytheon Canada Limited		
Facility Name	Raytheon ELCAN Optical Technologies		
Facility Address	Physical Address:	Mailing Address: (if different)	
	450 Leitz Road		
	Midland, Ontario		
	L4R 5B8		
Spatial Coordination of	Easting: 589108.67		
Facility	Northing: 4955704.30		
	Zone 17		
Number of Employees	805		
NPRI ID	7357		
Ontario MOE ID Number	N/A		
Parent Company (PC) Informat	on		
PC Name & Address	Raytheon Canada Limited		
	360 Albert St., Suite 1640		
Percent Ownership for each	Ottawa, Ontario K1R 7X7		
PC	100%		
Business Number for PC	10070		
Primary North American Industr	ial Classification System Code (NAIC	:S)	
2 Digit NAICS Code	31 33 – Manufacturing	<u> </u>	
4 Digit NAICS Code	3333 Commercial and service industry machinery manufacturing		
6 Digit NAICS Code	333310 Commercial and service industry machinery manufacturing		
Company Contact Information		, ,	
Facility Public Contact	Mr. Fred Hibbs, Senior Manager	Same address as facility	
r domity r dibito contact	fhibbs@elcan.com	,	
	Phone: (705) 528-7179		
	Fax: (705) 528-7122		
Facility Technical Contact	1 ax. (100) 020 1 122		
	Mr Michael Reid Manager	Same as facility address	
radiity rediinidal dentade	Mr. Michael Reid, Manager Environmental Health & Safety	Same as facility address	
radinty rediffical contact		Same as facility address	
r domey recommon contact	Environmental Health & Safety	Same as facility address	
r domey recommon contact	Environmental Health & Safety mreid@elcan.com	Same as facility address	

Person who Prepared the Plan: (if different from the Coordinator)	Sean Williams Sean.Williams@ghd.com Phone: (519) 884-0510 ext. 2219 Fax: (519) 884-0525 Sean Williams	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
Highest Ranking Employee	Mr. Fred Hibbs, Senior Manager fhibbs@elcan.com Phone: (705) 528-7179 Fax: (705) 528-7122	Same as facility address
Planner Information:		
Planner Responsible for Making Recommendations	Dana Lauder Planner License No. TSRP0014 Dana.Lauder@ghd.com Phone: (519) 884-0510 ext. 2299 Fax: (519) 884-0525	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
Planner Responsible for Certification	(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 total selenium (selenium) 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 selenium 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 selenium, 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 selenium 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. Selenium is used at the facility as contained within the various lenses used – the major contributor is within zinc selenide lenses, with a small quantity contained in glass lenses which contain selenium oxide.

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 Selenium.

Plan Summary Statement

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

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

December 22, 2015

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

December 22, 2015

Date

Dana Lauder, P. Eng.

Planner License # TSRP0014

GHD Limited