

May 28, 2013

Mark Wiedener
Greenflow Environmental Services Inc.

LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CERTIFICATION STATEMENT FOR PHASE I TOXIC SUBSTANCE REDUCTION PLANS FOR MARSWELL METAL INDUSTRIES LTD, INCLUDING ITS DIVISIONS MARSKEEL, MARS METAL SPECIALTY CASTINGS.

Dear Mr. Milne,

Greenflow Environmental Services Inc. (Greenflow) was engaged by Marswell Metal Industries Ltd. (the Facility) to provide guidance pertaining to Phase I Toxic Substance Reduction Plan preparation under the *Toxics Reduction Act* (TRA), including providing confirmation of Phase I Toxic Reduction Plans (the Plans).

The following Planner Confirmation Statement, which comes in lieu of the Planner Certification Statement required under s. 19. 1(4) of Ontario Regulation (O. Reg.) 455/09 (as amended by s. 11 of O. Reg. 214/11) satisfies the requirements for the Plans that are assembled as a single document as of the date of this Planner Confirmation Statement. Furthermore, the following confirmation statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

As of (May 28, 2013), I, Mark Wiedener confirm that I am familiar with the processes at the Marswell Metal Industries Ltd. Facility that use of create the toxic substances referred to below, that I agree with the estimates referred to in its contents, and it satisfies all other requirements, with the exception of the regulatory deadline as determined by the Toxic Reduction Act and Ontario Regulation 455/09.

- *Lead (May 28, 2013)*
- *Antimony (May 28, 2013)*
- *Xylene (May 28, 2013)*
- *Ethyl Benzene (May 28, 2013)*



Mark Wiedener
Toxic Substance Reduction Planner
License No. TSRP 0255

MAY 29, 2013
Date

Toxic Substance Reduction Plans Confirmation by Highest Ranking Employee

As required by s. 4(2) of the *Toxics Reduction Act* (TRA), Toxic Substance Reduction Plans must contain a certification signed by the highest ranking employee at the Facility who has management responsibilities relating to the Facility.

As a result of the inability to meet the regulatory deadline of December 31, 2012, this Plan contains a confirmation statement from the highest ranking employee in lieu of the required certification statement:

As of (date) MAY 29, 2013, I, (insert name) KEVIN MILNE, confirm that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the *Toxics Reduction Act, 2009* and *Ontario Regulation 455/09* made under that Act, with the exception of the certification statements as a result of the inability of the Facility, in spite of its best efforts, to meet the December 31st regulatory deadline. This was mainly due to the Facility allocating time and resources towards updating ministry approvals with regard to air and seeking proper testing to aid in the creation of this document.

- Lead (May 28, 2013)
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Kevin Milne
President
Marswell Metal Industries Ltd.

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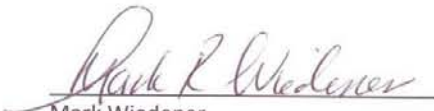
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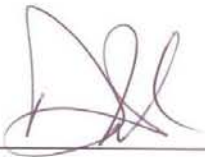
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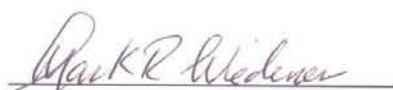
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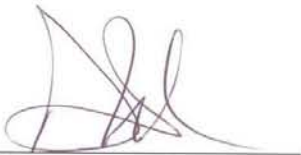
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Kevin Milne
President
Marswell Metal Industries Ltd.

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Date

Greenflow Environmental Services (Greenflow) was retained by Marswell Metal Industries Ltd. (the Facility) to provide various services pertaining to Phase I Toxic Substance Reduction Plan preparation under the *Toxics Reduction Act (TRA)*, including Toxic Substance Reduction Planner Recommendations (Planner Recommendations).

As required by s. 18.2 of Ontario Regulation (O. Reg.) 455/09 (as amended by s. 10 of O. Reg 214/11), a facility is required to provide a draft copy of the Plan to a licensed Toxic Substance Reduction Planner (the Planner) for the purpose of obtaining recommendations with respect to the Plan. This document fulfills the requirements of s. 18.2 of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) for the draft document entitled "Toxic Substance reduction Plan – Lead Version 1.0" (the Plan) which has been prepared for the prescribed toxic substance referred to as Lead (the Toxic Substance)

Planner Recommendation Requirements Under the TRA and O. Reg 455/09

Section 18.2(3) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) provides the areas of a given Plan in which Planner Recommendations are required to be documented (the Areas of Recommendation). As required by s. 18.2(4) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11), a Planner must also provide a rationale for each Planner Recommendation. Implementing the Planner Recommendations (if any) is voluntary.

As stated in s. 18.2(2) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11), Planner Recommendations shall be provided for the purpose of improving all aspects of the Plan, including:

- The potential for reducing the use and creation of the toxic substance at the facility; and
- The business rationale for implementing the Plan

S. 18.2(5) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) a Planner must provide a written explanation if the Planner is of the opinion that no recommendations are necessary with respect to any of the Areas of Recommendation.

Written Explanation for No Necessary Recommendations

The Planner is of the opinion that no recommendations are necessary with respect to any of the Areas of Recommendation within the Plan.

The following written explanation is being provided by the Planner to the Facility under s. 18.2(5) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) and satisfies the Facility's requirements for Planner Recommendations under s. 18.2 of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) pertaining to the Plan for the Toxic Substance:

TECHNICAL MEMORANDUM

It is the opinion of the Planner that no recommendations are necessary with respect to any of the categories listed within paragraphs 1-6 of s. 18.2(3) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) for the Plan. The rationale being, after completing the TRA exercise for the Toxic Substance, the Facility is of the opinion that the Facility finds itself in a situation where options for reductions in its "use" of the Toxic Substance cannot be identified under the framework of the TRA. No obvious feasible toxic substance reduction options were revealed by undertaking the TRA exercise with respect to the Toxic Substance. With this information in mind, the Facility has not included within the Plan a statement of its intent to reduce its use of the Toxic Substance under the framework of the TRA. The Planner and the Facility feel that there is little value in providing Planner Recommendations on a Plan that the Planner feels is compliant, aside from the absent certification statements, and addresses all matters within the framework of the TRA and O. Reg 455/09 for a substance whose use the Facility does not intend to reduce.

Closing Statement

This document provides the correct records required to satisfy s. 18. 2 of O. Reg 455/09 (as amended by s. 10 of O. Reg 214/11) with respect to the draft Plan. It is recommended that a copy of this document be appended to the final version of the Plan.

Sincerely,

Greenflow Environmental Services Inc.



Mark Wiedener
Toxic Substance Reduction Planner
License No. TSRP0255

Greenflow Environmental Services (Greenflow) was retained by Marswell Metal Industries Ltd. (the Facility) to provide various services pertaining to Phase I Toxic Substance Reduction Plan preparation under the *Toxics Reduction Act* (TRA), including Toxic Substance Reduction Planner Recommendations (Planner Recommendations).

As required by s. 18.2 of Ontario Regulation (O. Reg.) 455/09 (as amended by s. 10 of O. Reg 214/11), a facility is required to provide a draft copy of the Plan to a licensed Toxic Substance Reduction Planner (the Planner) for the purpose of obtaining recommendations with respect to the Plan. This document fulfills the requirements of s. 18.2 of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) for the draft document entitled "Toxic Substance reduction Plan – Antimony Version 1.0" (the Plan) which has been prepared for the prescribed toxic substance referred to as Lead (the Toxic Substance)

Planner Recommendation Requirements Under the TRA and O. Reg 455/09

Section 18.2(3) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) provides the areas of a given Plan in which Planner Recommendations are required to be documented (the Areas of Recommendation). As required by s. 18.2(4) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11), a Planner must also provide a rationale for each Planner Recommendation. Implementing the Planner Recommendations (if any) is voluntary.

As stated in s. 18.2(2) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11), Planner Recommendations shall be provided for the purpose of improving all aspects of the Plan, including:

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Written Explanation for No Necessary Recommendations

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The following written explanation is being provided by the Planner to the Facility under s. 18.2(5) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) and satisfies the Facility's requirements for Planner Recommendations under s. 18.2 of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) pertaining to the Plan for the Toxic Substance:

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Closing Statement

This document provides the correct records required to satisfy s. 18.2 of O. Reg 455/09 (as amended by s. 10 of O. Reg 214/11) with respect to the draft Plan. It is recommended that a copy of this document be appended to the final version of the Plan.

Sincerely,

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Planner Recommendation Requirements Under the TRA and O. Reg 455/09

Section 18.2(3) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11) provides the areas of a given Plan in which Planner Recommendations are required to be documented (the Areas of Recommendation). As required by s. 18.2(4) of O. Reg. 455/09 (as amended by s. 10 of O. Reg 214/11), a Planner must also provide a rationale for each Planner Recommendation. Implementing the Planner Recommendations (if any) is voluntary.

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