

**TOXIC SUBSTANCE REDUCTION PLAN SUMMARY
(SULPHURIC ACID)**

A.G.SIMPSON AUTOMOTIVE INC. OSHAWA PLANT

December 19, 2012

BASIC FACILITY INFORMATION

Substance name and Chemical Abstracts Service Registry number, if any:

Name: Sulphuric acid

Chemical Abstracts Service Registry number: 7664-93-9

The National Pollutant Release Inventory (NPRI) identification number for the facility:

003120

The identification number assigned by the ministry for the purposes of Ontario Regulation 127/01 (Airborne Contaminant Discharge Monitoring and Reporting), if one has been assigned:

N/A

The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address, if different:

A.G.Simpson Automotive Inc. Oshawa Plant

901 Simcoe Street South,

Oshawa, Ontario L1H 4L2

The number of full-time employee equivalents at the facility:

74

The two-and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code for the facility:

33 Metal, Computer, Appliance, Transportation, Furniture, Misc. Manufacturing

3312 Steel Product manufacturing from Purchased Steel

336370 motor Vehicle Metal Parts Stamping

332810 Electroplating, Plating, Polishing, Anodizing, and Coloring

If applicable, the name, position and telephone number of the person who is the contact at the facility for the public:

Mr. Maurice Pestowka

Position: MGR Corp. env. Affairs

Phone: (519) 572-7139

Fax: (519) 621-1177

mauricep@agsautomotive.com

The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum:

UTM Zone 17, NAD 83, Central Meridian 81 degrees west, 6 degree projection

In respect of each person who is the Canadian parent company of the facility, if applicable. The legal name of the person, the street and mailing address, if different from the facility, if applicable, the company's percentage of ownership of the person responsible for ensuring a toxic substance reduction plan is prepared:

A. G. Simpson Automotive Inc. (100%)

675 Progress Avenue

Toronto, ON M1H 2W9

OTHER MANDATORY INFORMATION

List all other substances for which plans have been prepared at the facility:

Nickel and its compounds

Hexavalent chromium and its compounds

Lead and its compounds

Copper and its compounds

Statement of intent to reduce the substance, or a rationale for why reduction is not feasible:

A. G. Simpson Automotive Inc. Oshawa Plant is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use of sulphuric acid in full compliance with all federal and provincial regulations. This facility does not create sulphuric acid; therefore this plan will not address reducing its creation. Toxic substance reduction will be an ongoing effort at A. G. Simpson Automotive Inc. Oshawa Plant and we will continue to monitor technological advancements to ensure that options that are both technologically and economically viable are implemented at our plant.

Toxic substance reduction objectives (required) and any targets (optional):

Our goal is to efficiently utilize the least amount of sulphuric acid where technically and economically feasible. We will achieve these reductions through continuously reviewing processes, procedures and customer specifications.

Description of why toxic substance is used or created:

Sulphuric acid is added to anodic acid dip tank and cathodic acid dip tank to create an aqueous solution, and then the parts are processed with the metal surface of the parts being dissolved as well as cleaned. The cleaning action removes all residual traces of dirt and surface impurities on the parts. A small quantity of sulphuric acid is added to the chrome plating tank to adjust the pH of the chrome plating solution as well.

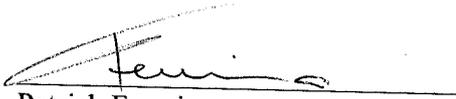
SB Nickel Additive CS-5 contains 60 percent of sulphuric acid and is added to nickel electroplating tank as a brightener. The chemical reaction of sulphuric acid and nickel products nickel sulfate. As the result, the amount of sulphuric acid added to nickel electroplating tank is destroyed.

Description of options to be implemented, or, if no options have been selected for implementation, a rationale for why implementation will not take place:

Currently we are not implementing the options identified. There is currently no budget allotted for option implementation. The plant resources are fully deployed in corporate wide part launches. All options are not fully understood as suppliers are slow to respond to information requests. However, we are actively considering the opportunity of reducing the concentration of sulphuric acid in our high concentration process.

CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 19, 2012, I, Patrick Ferreira, 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.
Sulphuric Acid



Patrick Ferreira
Plant Manager
A.G.Simpson Automotive Inc.

CERTIFICATION BY LICENSED PLANNER

As of December 19, 2012, I, Maurice Pestowka, certify that I am familiar with the processes at A. G. Simpson Automotive Inc. that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7iii, iv and v of subsection 4(1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 19, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.
Sulphuric Acid



Maurice Pestowka [Planner License # TSRP0132]
Manager, Corporate Environmental Affairs / Toxic Substance Reduction Planner
A. G. Simpson Automotive Inc.

Reference:

<http://chemicaland21.com/industrialchem/inorganic/HYDROCHLORIC%20ACID.htm>

**TOXIC SUBSTANCE REDUCTION PLAN SUMMARY
(NICKEL)**

A.G.SIMPSON AUTOMOTIVE INC. OSHAWA PLANT

December 19, 2012

BASIC FACILITY INFORMATION

Substance name and Chemical Abstracts Service Registry number, if any:

Name: Nickel

Chemical Abstracts Service Registry number: N/A

The National Pollutant Release Inventory (NPRI) identification number for the facility:

003120

The identification number assigned by the ministry for the purposes of Ontario Regulation 127/01 (Airborne Contaminant Discharge Monitoring and Reporting), if one has been assigned:

N/A

The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address, if different:

A.G.Simpson Automotive Inc. Oshawa Plant

901 Simcoe Street South,

Oshawa, Ontario L1H 4L2

The number of full-time employee equivalents at the facility:

74

The two-and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code for the facility:

33 Metal, Computer, Appliance, Transportation, Furniture, Misc. Manufacturing

3312 Steel Product manufacturing from Purchased Steel

336370 motor Vehicle Metal Parts Stamping

332810 Electroplating, Plating, Polishing, Anodizing, and Coloring

If applicable, the name, position and telephone number of the person who is the contact at the facility for the public:

Mr. Maurice Pestowka

Position: MGR Corp. env. Affairs

Phone: (519) 572-7139

Fax: (519) 621-1177

mauricep@agsautomotive.com

The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum:

UTM Zone 17, NAD 83, Central Meridian 81 degrees west, 6 degree projection

In respect of each person who is the Canadian parent company of the facility, if applicable. The legal name of the person, the street and mailing address, if different from the facility, if applicable, the company's percentage of ownership of the person responsible for ensuring a toxic substance reduction plan is prepared:

A. G. Simpson Automotive Inc. (100%)

675 Progress Avenue

Toronto, ON M1H 2W9

OTHER MANDATORY INFORMATION

List all other substances for which plans have been prepared at the facility:

Sulphuric acid (CAS# 7664-93-9)

Hexavalent chromium and its compounds

Lead and its compounds

Copper and its compounds

Statement of intent to reduce the substance, or a rationale for why reduction is not feasible:

A.G. Simpson Automotive Inc. Oshawa Plant does not intend to reduce its use of nickel because nickel is a customer specified component of the finished product. As a manufacturer of nickel chrome plated automotive bumpers its reduction will not benefit our business growth. Nickel is specified by our customer for its corrosion protection properties.

Toxic substance reduction objectives (required) and any targets (optional):

Our goal is to efficiently utilize the least amount of nickel where technically and economically feasible. We will achieve these reductions through continuously reviewing processes, procedures and customer specifications.

Description of why toxic substance is used or created:

Nickel is used as anode in the nickel electroplating process. It's placed as nickel metal in anode baskets hung inside of the electroplating tank. Loads of parts are transferred into the tank and immersed into an electrolyte solution. The nickel anode dissolved into the

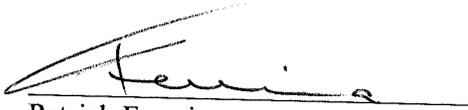
electrolyte in the form of nickel ions. The ions electrolytically travel through the solution and deposit on the cathode surface (parts) through direct electric current flows between the anode and the cathode.

Description of options to be implemented, or, if no options have been selected for implementation, a rationale for why implementation will not take place:

Currently we are not implementing the options identified. However, we are actively considering the opportunity of utilizing inert anodes as a process improvement and to further allow other process improvements. This is due in part to lack of resources, funding not in current budget and availability of technical information. The use of inert anodes would be an R&D project as we believe it is not commercially available for our application.

CERTIFICATION BY HIGHEST RANKING EMPLOYEE

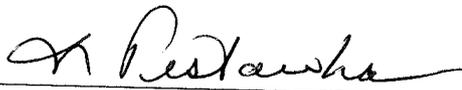
As of December 19, 2012, I, Patrick Ferreira, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.
Nickel



Patrick Ferreira
Plant Manager
A.G.Simpson Automotive Inc.

CERTIFICATION BY LICENSED PLANNER

As of December 19, 2012, I, Maurice Pestowka, certify that I am familiar with the processes at A. G. Simpson Automotive Inc. that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7iii, iv and v of subsection 4(1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 19, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.
Nickel



Maurice Pestowka [Planner License # TSRP0132]
Manager, Corporate Environmental Affairs / Toxic Substance Reduction Planner
A.G.Simpson Automotive Inc.

**TOXIC SUBSTANCE REDUCTION PLAN SUMMARY
(HEXAVALENT CHROMIUM)**

A.G.SIMPSON AUTOMOTIVE INC. OSHAWA PLANT

December 19, 2012

BASIC FACILITY INFORMATION

Substance name and Chemical Abstracts Service Registry number, if any:

Name: Hexavalent chromium

Chemical Abstracts Service Registry number: N/A

The National Pollutant Release Inventory (NPRI) identification number for the facility:

003120

The identification number assigned by the ministry for the purposes of Ontario Regulation 127/01 (Airborne Contaminant Discharge Monitoring and Reporting), if one has been assigned:

N/A

The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address, if different:

A.G.Simpson Automotive Inc. Oshawa Plant

901 Simcoe Street South,

Oshawa, Ontario L1H 4L2

The number of full-time employee equivalents at the facility:

74

The two-and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code for the facility:

33 Metal, Computer, Appliance, Transportation, Furniture, Misc. Manufacturing

3312 Steel Product manufacturing from Purchased Steel

336370 motor Vehicle Metal Parts Stamping

332810 Electroplating, Plating, Polishing, Anodizing, and Coloring

If applicable, the name, position and telephone number of the person who is the contact at the facility for the public:

Mr. Maurice Pestowka

Position: MGR Corp. env. Affairs

Phone: (519) 572-7139

Fax: (519) 621-1177

mauricep@agsautomotive.com

The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum:

UTM Zone 17, NAD 83, Central Meridian 81 degrees west, 6 degree projection

In respect of each person who is the Canadian parent company of the facility, if applicable. The legal name of the person, the street and mailing address, if different from the facility, if applicable, the company's percentage of ownership of the person responsible for ensuring a toxic substance reduction plan is prepared:

A. G. Simpson Automotive Inc. (100%)

675 Progress Avenue

Toronto, ON M1H 2W9

OTHER MANDATORY INFORMATION

List all other substances for which plans have been prepared at the facility:

Sulphuric acid (CAS# 7664-93-9)

Nickel and its compounds

Lead and its compounds

Copper and its compounds

Statement of intent to reduce the substance, or a rationale for why reduction is not feasible:

A. G. Simpson Automotive Inc. Oshawa Plant does not intend to reduce its use of hexavalent chromium because hexavalent chromium is a customer specified component of the manufacturer of chrome plated automotive bumpers and reducing its use will not benefit our business growth. A. G. Simpson Automotive Inc. Oshawa Plant utilizes a highly efficient reclamation system and where possible will reduce chromium being lost from the process.

Toxic substance reduction objectives (required) and any targets (optional):

Our goal is to efficiently utilize the least amount of hexavalent chromium where technically and economically feasible. We will achieve these reductions through continuously reviewing processes, procedures and customer specifications.

Description of why toxic substance is used or created:

Hexavalent chromium is originally present as chromic acid in the chrome plating process. Chromic acid is added to water to create an aqueous solution containing chromium ions through which direct electric current flows between an anode and a cathode. Parts are

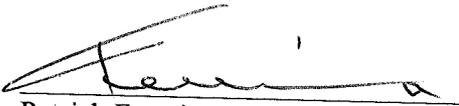
immersed into the aqueous solution. When the current is turned on, a layer of electrolytic chromium (metallic chromium) is plated over the nickel on the parts to improve the nickel's durability.

Description of options to be implemented, or, if no options have been selected for implementation, a rationale for why implementation will not take place:

Options identified have been previously implemented through continuous improvement process and constantly pursuing process improvement.

CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 19, 2012, I, Patrick Ferreira, 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.
Hexavalent chromium



Patrick Ferreira
Plant Manager
A.G.Simpson Automotive Inc.

CERTIFICATION BY LICENSED PLANNER

As of December 19, 2012, I, Maurice Pestowka, certify that I am familiar with the processes at A.G.Simpson Automotive Inc. that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7iii, iv and v of subsection 4(1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 19, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.
Hexavalent chromium



Maurice Pestowka [Planner License # TSRP0132]
Manager, Corporate Environmental Affairs / Toxic Substance Reduction Planner
A.G.Simpson Automotive Inc.

**TOXIC SUBSTANCE REDUCTION PLAN SUMMARY
(COPPER)**

A.G.SIMPSON AUTOMOTIVE INC. OSHAWA PLANT

December 19, 2012

BASIC FACILITY INFORMATION

Substance name and Chemical Abstracts Service Registry number, if any:

Name: Copper

Chemical Abstracts Service Registry number: N/A

The National Pollutant Release Inventory (NPRI) identification number for the facility:

003120

The identification number assigned by the ministry for the purposes of Ontario Regulation 127/01 (Airborne Contaminant Discharge Monitoring and Reporting), if one has been assigned:

N/A

The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address, if different:

A.G.Simpson Automotive Inc. Oshawa Plant

901 Simcoe Street South,

Oshawa, Ontario L1H 4L2

The number of full-time employee equivalents at the facility:

74

The two-and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code for the facility:

33 Metal, Computer, Appliance, Transportation, Furniture, Misc. Manufacturing

3312 Steel Product manufacturing from Purchased Steel

336370 motor Vehicle Metal Parts Stamping

332810 Electroplating, Plating, Polishing, Anodizing, and Coloring

If applicable, the name, position and telephone number of the person who is the contact at the facility for the public:

Mr. Maurice Pestowka

Position: MGR Corp. env. Affairs

Phone: (519) 572-7139

Fax: (519) 621-1177

mauricep@agsautomotive.com

The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum:

UTM Zone 17, NAD 83, Central Meridian 81 degrees west, 6 degree projection

In respect of each person who is the Canadian parent company of the facility, if applicable. The legal name of the person, the street and mailing address, if different from the facility, if applicable, the company's percentage of ownership of the person responsible for ensuring a toxic substance reduction plan is prepared:

A. G. Simpson Automotive Inc. (100%)

675 Progress Avenue

Toronto, ON M1H 2W9

OTHER MANDATORY INFORMATION

List all other substances for which plans have been prepared at the facility:

Sulphuric acid (CAS# 7664-93-9)

Hexavalent chromium and its compounds

Nickel and its compounds

Lead and its compounds

Statement of intent to reduce the substance, or a rationale for why reduction is not feasible:

A. G. Simpson Automotive Inc. Oshawa Plant does not intend to reduce its use of copper because copper are not a formulation component in the plating operation. Copper is used as anode and cathode rails which form part of the direct electric current circuit, therefore reducing the use of copper as a current circuit will not be practical. Wherever feasible, A.G. Simpson Automotive Inc. Oshawa Plant will eliminate or reduce the release of copper in full compliance with all federal and provincial regulations. This facility does not create copper; therefore this plan will not address reducing its creation. Toxic substance reduction will be an ongoing effort at A.G. Simpson Automotive Inc. Oshawa Plant, and we will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at our facility.

Toxic substance reduction objectives (required) and any targets (optional):

Our goal is to reduce the release of copper where technically and economically feasible. We will achieve the reduction through continuously reviewing processes and procedures.

Description of why toxic substance is used or created:

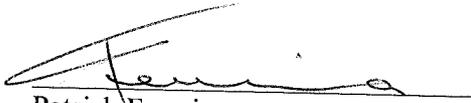
The source of copper is anode and cathode rails (electrical circuit). The electrification in the plating bath is very low voltage and high amperage. Because copper has high conductivity, it is used to form anode and cathode rails on the tanks carrying current in the preparation stage and production stage. The copper is not part of the plating operation but a small amount of copper is corroded away and enters the baths. Finally, the chemical solution contains copper from the plating activity is transferred to the wastewater treatment process for treatment.

Description of options to be implemented, or, if no options have been selected for implementation, a rationale for why implementation will not take place:

Copper is not a formulation component in the production process of A. G. Simpson Automotive Oshawa Plant. It's a product A. G. Simpson purchased. Currently we have no options identified due to the feasibility.

CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 19, 2012, I, Patrick Ferreira, 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



Patrick Ferreira
Plant Manager
A.G.Simpson Automotive Inc.

CERTIFICATION BY LICENSED PLANNER

As of December 19, 2012, I, Maurice Pestowka, certify that I am familiar with the processes at A.G.Simpson Automotive Inc. that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7iii, iv and v of subsection 4(1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 19, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.
Copper



Maurice Pestowka [Planner License # TSRP0132]
Manager, Corporate Environmental Affairs / Toxic Substance Reduction Planner
A.G.Simpson Automotive Inc.

**TOXIC SUBSTANCE REDUCTION PLAN SUMMARY
(LEAD)**

A.G.SIMPSON AUTOMOTIVE INC. OSHAWA PLANT

December 19, 2012

BASIC FACILITY INFORMATION

Substance name and Chemical Abstracts Service Registry number, if any:

Name: Lead

Chemical Abstracts Service Registry number: N/A

The National Pollutant Release Inventory (NPRI) identification number for the facility:

003120

The identification number assigned by the ministry for the purposes of Ontario Regulation 127/01 (Airborne Contaminant Discharge Monitoring and Reporting), if one has been assigned:

N/A

The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address, if different:

A.G.Simpson Automotive Inc. Oshawa Plant

901 Simcoe Street South,

Oshawa, Ontario L1H 4L2

The number of full-time employee equivalents at the facility:

74

The two-and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code for the facility:

33 Metal, Computer, Appliance, Transportation, Furniture, Misc. Manufacturing

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336370 motor Vehicle Metal Parts Stamping

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If applicable, the name, position and telephone number of the person who is the contact at the facility for the public:

Mr. Maurice Pestowka

Position: MGR Corp. env. Affairs

Phone: (519) 572-7139

Fax: (519) 621-1177

mauricep@agsautomotive.com

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In respect of each person who is the Canadian parent company of the facility, if applicable. The legal name of the person, the street and mailing address, if different from the facility, if applicable, the company's percentage of ownership of the person responsible for ensuring a toxic substance reduction plan is prepared:

A. G. Simpson Automotive Inc. (100%)

675 Progress Avenue

Toronto, ON M1H 2W9

OTHER MANDATORY INFORMATION

List all other substances for which plans have been prepared at the facility:

Sulphuric acid (CAS# 7664-93-9)

Hexavalent chromium and its compounds

Nickel and its compounds

Copper and its compounds

Statement of intent to reduce the substance, or a rationale for why reduction is not feasible:

A.G. Simpson Automotive Inc. Oshawa Plant does not intend to reduce its use of lead because lead anodes are not a formulation component in the plating operation. Lead anodes are used because of their chemical resistance in acid and chromium solutions. Reducing the use of lead anodes will not benefit our plating business growth. Wherever feasible, A.G. Simpson Automotive Inc. Oshawa Plant will eliminate or reduce the release of lead in full compliance with all federal and provincial regulations. This facility does not create lead; therefore this plan will not address reducing its creation. Toxic substance reduction will be an ongoing effort at A.G. Simpson Automotive Inc. Oshawa Plant, and we will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at our facility.

Toxic substance reduction objectives (required) and any targets (optional):

Our goal is to reduce the release of lead where technically and economically feasible. We will achieve the reduction through continuously reviewing processes and procedures.

Description of why toxic substance is used or created:

Lead is used as anode in the anodic and cathodic acid tanks and the chrome electroplating process. Loads of parts are transferred into the tank and immersed into an electrolyte solution. The lead anode dissolves slowly over time into the electrolyte in the form of lead ions. The lead ions are a contaminant and are removed either with the change out of the acid or in the case of chrome tank form insoluble lead chromate sludge that is removed periodically with tank cleaning.

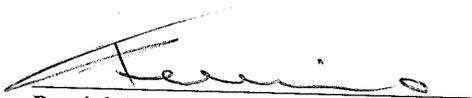
Description of options to be implemented, or, if no options have been selected for implementation, a rationale for why implementation will not take place:

Lead is not a formulation component in the production process of A. G. Simpson Automotive Oshawa Plant. It's a product A. G. Simpson purchased. Currently there are no options identified due to the chemical compatibility of lead anodes used.

CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 19, 2012, I, Patrick Ferreira, 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.

Lead



Patrick Ferreira
Plant Manager
A. G. Simpson Automotive Inc.

CERTIFICATION BY LICENSED PLANNER

As of December 19, 2012, I, Maurice Pestowka, certify that I am familiar with the processes at A. G. Simpson Automotive Inc. that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7iii, iv and v of subsection 4(1) of the *Toxics Reduction Act, 2009* that are set out in the plan dated December 19, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Lead



Maurice Pestowka [Planner License # TSRP0132]
Manager, Corporate Environmental Affairs / Toxic Substance Reduction Planner
A. G. Simpson Automotive Inc.