

**2012 TOXIC SUBSTANCE REDUCTION PLAN SUMMARY
(MANGANESE AND ITS COMPOUNDS)**

A.G.SIMPSON AUTOMOTIVE INC. WINDSOR PLANT

December 19, 2013

BASIC FACILITY INFORMATION

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

Name: Manganese and its compounds

Chemical Abstracts Service Registry number: NA

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

002404

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. Windsor Plant

275 Eugenie Street East

Windsor, Ontario N8X 2X9

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

52

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

NAICS 2 Code: 33 - Metal, Computer, Appliance, Transportation, Furniture, Misc. Manufacturing

NAICS 4 Code: 3363 - Motor Vehicle Parts Manufacturing

NAICS 6-digit Code: Motor vehicle metal parts stamping (336370)

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: Manager, Corporate Environmental 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, 333868.6E, 4683658.5N

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.

675 Progress Avenue

Toronto, ON M1H 2W9

100%

OTHER MANDATORY INFORMATION

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

Name: Zinc and its compounds

Chemical Abstracts Service Registry number: NA

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

The A. G. Simpson Automotive Inc. (AGS) Windsor plant does not intend to reduce its use of manganese because the steel blanks, welding pieces and welding wire that contain manganese are not products of the AGS welding operation and are chosen as such to meet applicable customer specifications. The facility is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use of manganese and its compounds in full compliance with all federal and provincial regulations. This facility does not create manganese; therefore this plan will not address reducing its creation. Toxic substance reduction will be an ongoing effort at the facility and we will continue to monitor technological advancements to ensure that options that are both technologically and economically viable and that meet customer specifications are given appropriate consideration with the resources available at our plant.

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

Our goal is to efficiently utilize the least amount of manganese and its compounds 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:

The AGS Windsor facility manufactures automotive parts, including the stamping of metal parts and welding of stamped parts. Steel blanks, welding wire and welding pieces are raw materials required for these processes and are purchased by AGS.

Steel blanks received by the facility contain manganese. These blanks are subsequently stamped to the required specification. Following stamping, parts are moved to the welding process to be welded according to customer specifications. The finished stamped and welded parts are packaged and sent for shipping. Welding wire used in the MIG welding process also contains manganese. In the MIG welding process, an electric arc forms between a consumable wire electrode and the parts, which heats the part, causing them to melt, and join. Welding pieces such as nuts and studs that are used in the projection welding process also contain manganese. In projection welding process, the metal surfaces are joined by the heat obtained from resistance to electric current and downward force causing the heated projections on the welding pieces to collapse joining the welded pieces to the base metal.

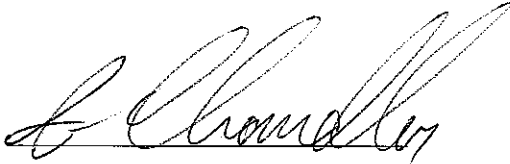
The manganese is present in the steel blanks, welding wire and welding pieces to add strength and the quantity or concentration is driven by customer specifications based on the required end functionality and performance characteristics needed in their finished product.

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

Steel blanks, welding wire and welding pieces that contain manganese are not formulation components in the production process at the Windsor plant, rather they are purchased. Currently we are not implementing the options identified, however, we are actively evaluating an alternative method to projection welding of nuts on new programs.

Statement that the plan summary accurately reflects the plan:

As of December 19, 2013, I certify that I have read the reports on the toxic substance reduction plans for manganese and its compounds and am familiar with their contents and to my knowledge the information contained in the reports is factually accurate and the reports comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

A handwritten signature in black ink, appearing to read 'Ivor Chandler', written over a horizontal line.

Mr. Ivor Chandler
Production Manager
A.G.S. Automotive Systems Windsor Plant

Planner license number (for the planner who provided recommendations and for the certifying planner)

TSRP0132

**2012 TOXIC SUBSTANCE REDUCTION PLAN SUMMARY
(ZINC AND ITS COMPOUNDS)**

A.G. SIMPSON AUTOMOTIVE INC. WINDSOR PLANT

December 19, 2013

BASIC FACILITY INFORMATION

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

Name: Zinc and its compounds

Chemical Abstracts Service Registry number: NA

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

002404

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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. Windsor Plant

275 Eugenie Street East

Windsor, Ontario N8X 2X9

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

52

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

NAICS 2 Code: 33 - Metal, Computer, Appliance, Transportation, Furniture, Misc. Manufacturing

NAICS 4 Code: 3363 - Motor Vehicle Parts Manufacturing

NAICS 6-digit Code: Motor vehicle metal parts stamping (336370)

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: Manager, Corporate Environmental 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, 333868.6E, 4683658.5N

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.

675 Progress Avenue

Toronto, ON M1H 2W9

100%

OTHER MANDATORY INFORMATION

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

Name: Manganese and its compounds

Chemical Abstracts Service Registry number: NA

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

The A. G. Simpson Automotive Inc. (AGS) Windsor Plant does not intend to reduce its use of zinc because the steel blanks that contain a zinc coating are not products of the AGS welding operation and are chosen as such to meet applicable customer specifications. The facility is committed to playing a leadership role in protecting the environment. Wherever feasible, we will eliminate or reduce the use of zinc and its compounds in full compliance with all federal and provincial regulations. This facility does not create manganese; therefore this plan will not address reducing its creation. Toxic substance reduction will be an ongoing effort at the facility and we will continue to monitor technological advancements to ensure that options that are both technologically and economically viable and that meet customer specifications are given appropriate consideration with the resources available at our plant.

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

Our goal is to efficiently utilize the least amount of zinc and its compounds 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:

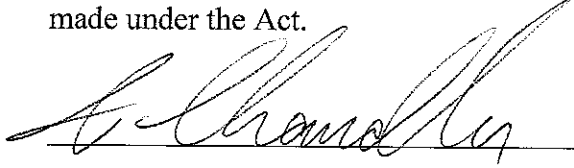
The AGS Windsor facility manufactures automotive parts, including stamping of metal parts and welding of the stamped parts. Zinc coated steel is raw material used in the stamping and welding processes and is purchased by the facility in accordance with the appropriate customer specifications. Following stamping, parts are moved to the welding process where they are welded and assembled according to customer requirements. The finished stamped and welded parts are packaged and sent for shipping. The zinc is present on the steel to add corrosion resistance and the quantity or concentration is driven by customer specifications based on the required end functionality and performance characteristics needed in their finished product.

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

Zinc coated steel blanks are not a formulation component in the production process of the A. G. Simpson Automotive Inc. Windsor plant. They are products A. G. Simpson purchased. Currently there are no options identified due to the feasibility.

Statement that the plan summary accurately reflects the plan:

As of December 19, 2013, I certify that I have read the reports on the toxic substance reduction plans for zinc and its compounds and am familiar with their contents and to my knowledge the information contained in the reports is factually accurate and the reports comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

A handwritten signature in black ink, appearing to read 'I. Chandler', is written over a horizontal line.

Mr. Ivor Chandler
Production Manager
A.G.S. Automotive Systems Windsor Plant

Planner license number (for the planner who provided recommendations and for the certifying planner)

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