Toxics Reduction Act – Public Summary Report – 2019 Reporting Year

Ford Motor Company – Oakville Assembly Complex

A. FACILITY INFORMATION

The Oakville Assembly Complex operates as an automotive assembly plant for the production of the Ford Edge, Ford Flex, Lincoln MKX and Lincoln MKT. The main facility processes consist of body building, painting and assembly.

Address	The Canadian Road Oakville, Ontario L6J 5C9
Spatial Coordinates	Zone 17, 607468 m E, 4816131 m N
NPRI/MOECC IDs	NPRI = 3419 MECP = 6763
No. of Employees	4,300
Primary Operation	Automobile Assembly Plant
NAICS Code(s)	33 – Manufacturing 3361 – Motor Vehicle Manufacturing 336110 - Automobile and Light Duty Motor Vehicle Manufacturing
Facility Contact	Mr. Cary Holt Ford Motor Company Environmental Quality Office 290 Town Center Drive Suite 800 Dearborn, Michigan 48126 Phone: (313) 938-6055 Email: cholt2@ford.com
Parent Company	Ford Motor Company of Canada, Limited The Canadian Road Oakville, Ontario L6J 5E4

B. TOXIC SUBSTANCE ACCOUNTING

Substances Reported	CAS#	Primary Use/Source
NPRI Part 1 Substances		
Di-2-ethylhexyl phthalate	117-81-7	Sealers
Ethylbenzene	100-41-4	Solvents
Ethylene glycol	107-21-1	Radiator coolant
Ethylene glycol monobutyl ether	111-76-2	Solvents / E-coat
Isopropanol	67-63-0	Paints / solvents
Methyl alcohol	67-56-1	Windshield wash solution
Methyl isobutyl ketone	108-10-1	Solvents / E-coat
Nitric acid	7697-37-2	Phosphate coating
n-Butyl alcohol	71-36-3	Solvents
Sodium nitrite	7632-00-0	Phosphate coating/radiator coolant
1,2,4-Trimethylbenzene	95-63-6	Paints / solvents
Xylene	1330-20-7	Paints / solvents
Zinc (and its compounds)	n/a	Vehicle body / sealers
NPRI Part 4 Substances		
NO_x	11104-93-1	Fuel combustion
CO	630-08-0	Fuel combustion
PM_{10}	n/a	Spray coating / fuel combustion
$PM_{2.5}$	n/a	Spray coating / fuel combustion
NPRI Part 5 Substances		
Butane	n/a	Fuel combustion
Heavy aromatic solvent naphtha	64742-94-5	Paints / solvents
Hexane	n/a	Fuel combustion
Hydrotreated heavy naphtha	64742-48-9	Paints / solvents

Substances Reported	CAS#	Primary Use/Source
Hydrotreated light distillate	64742-47-8	Paints / solvents
Methyl ethyl ketone	78-93-3	Paints / solvents
Light aromatic solvent naphtha	64742-95-6	Paints / solvents
n-Butyl acetate	123-86-4	Paints / solvents
n-Heptane	142-82-5	Paints / solvents
Pentane	n/a	Fuel combustion
Propane	74-98-6	Fuel combustion
Solvent Naphtha Medium Aliphatic	64742-88-7	Solvents
Toluene	108-88-3	Paints / solvents
Trimethylbenzene	25551-13-7	Paints / solvents

Accounting Details

Substance/Category	Accounting Quantities				Reason for Change
	2018	2019	Annual Comparison		
	(tonne)	(tonne)	(tonne)	(%)	
Di-2-ethylhexyl phthalate					
Used	>10 to 100	>10 to 100	>0 to 1	1%	No significant change in use, air release or disposal.
Created	n/a	n/a	n/a	n/a	
Contained in Product	n/a	n/a	n/a	n/a	
Released to Air	0.899	0.907	0.008	1%	
Released to Water	n/a	n/a	n/a	n/a	
Transfer for Disposal	0.227	0.229	0.002	1%	
Transfer for Recycle	n/a	n/a	n/a	n/a	
Ethylbenzene					
Used	>10 to 100	>10 to 100	>10 to 100	19%	Increased usage of purge solvent containing ethylbenzene.
Created	0	0	n/a	n/a	
Contained in Product	0	0	n/a	n/a	
Released to Air	18.05	21.59	3.540	20%	
Released to Water	0	0	n/a	n/a	
Transfer for Disposal	0.002	0.003	0.000	22%	Increase in disposal amount due to assumed scrappage rate and increased usage of general use products containing ethylbenzene.
Transfer for Recycle	49.747	59.28	9.530	19%	Increased number of line cleanings in 2019 resulted in an increased quantity of ethylbenzene recovered in the spent purge solvent.
Ethylene glycol					
Used	>1,000 to 10,000	>1,000 to 10,000	>100 to 1000	15%	Increased production and usage of engine coolant.
Created	0	0	n/a	n/a	
Contained in Product	>1,000 to 10,000	>1,000 to 10,000	>100 to 1000	15%	
Released to Air	0	0	n/a	n/a	No significant change in air releases.
Released to Water	0	0	n/a	n/a	

Substance/Category	Accounting Quantities				Reason for Change
	2018	2019	Annual Comparison		
	(tonne)	(tonne)	(tonne)	(%)	
Transfer for Disposal	0.102	0.118	0.016	15%	Increased production and usage of engine coolant.
Transfer for Recycle	0	0	n/a	n/a	No change in off-site recycles.
Ethylene glycol monobutyl ether					
Used	>10 to 100	>10 to 100	(-)>1 to 10	-7%	Decreased usage of products containing EGME, however increased usage of spray coatings containing EGME.
Created	0	0	n/a	n/a	
Contained in Product	0	0	n/a	n/a	
Released to Air	6.437	6.577	0.140	2%	
Released to Water	0	0	n/a	n/a	One new spray coating contains EGME in which a portion is captured by the water curtain and released to MSTP.
Transfer for Disposed	0.108	0.118	0.010	9%	Increased usage of spray products containing EGME.
Transfer for Recycle	0	0	n/a	n/a	No change in off-site recycles.
Isopropanol					
Used	>10 to 100	>10 to 100	(-)>0 to 1	-1%	Decrease in usage of products containing isopropyl alcohol.
Created	0	0	n/a	n/a	
Contained in Product	0	0	n/a	n/a	
Released to Air	26.02	21.97	(-)4.049	-16%	
Released to Water	0.00	0	n/a	n/a	
Transfer for Disposal	0.531	0.507	(-)0.024	-4%	Decrease in spray coating and general use products containing isopropyl alcohol.
Transfer for Recycle	3.150	6.963	3.814	121%	Increased number of line cleanings in 2019 resulted in an increased quantity of isopropyl alcohol recovered in the spent purge solvent.
Methyl alcohol					
Used	>100 to 1,000	>100 to 1,000	>10 to 100	17%	Increased production and quantity of products containing methanol.
Created	0	0	n/a	n/a	

Substance/Category	Accounting Quantities				Reason for Change
	2018	2019	Annual Comparison		
	(tonne)	(tonne)	(tonne)	(%)	
Contained in Product	>100 to 1,000	>100 to 1,000	>10 to 100	17%	
Released to Air	28.157	2.026	(-)0.790	-28%	Decrease in the quantity of methanol in spray coatings.
Released to Water	0.000	0	n/a	n/a	
Transfer for Disposal	0.082	0.053	(-)0.029	-36%	Decrease in the quantity of methanol in spray coatings.
Transfer for Recycle	3.348	3.139	(-)0.209	-6%	Decrease in quantity of methanol recovered in the spent purge solvent.
Methyl isobutyl ketone					
Used	>10 to 100	>10 to 100	>1 to 10	15%	Increased production and usage of purge solvents containing MIBK.
Created	0	0	n/a	n/a	
Contained in Product	0	0	n/a	n/a	
Released to Air	10.13	4.43	(-)5.708	-56%	Increase in amount of purge solvent sent to recycling, resulted in a decreased air release.
Released to Water	0.00	0	n/a	n/a	
Transfer for Disposal	0.00	0	n/a	n/a	
Transfer for Recycle	30.11	42.16	12.047	40%	Increase in amount of purge solvent sent to recycling.
Nitric acid					
Used	>10 to 100	n/a	n/a	n/a	Nitric Acid usage is below reporting limit in 2019.
Created	0	n/a	n/a	n/a	
Contained in Product	0	n/a	n/a	n/a	
Released to Air	0	n/a	n/a	n/a	
Released to Water	0	n/a	n/a	n/a	
Transfer for Disposal	0	n/a	n/a	n/a	
Transfer for Recycle	0	n/a	n/a	n/a	

Substance/Category	Accounting Quantities				Reason for Change
	2018	2019	Annual Comparison		
	(tonne)	(tonne)	(tonne)	(%)	
n-Butyl alcohol					
Used	>100 to 1,000	>100 to 1,000	>10 to 100	7%	Increase in production and usage of products containing n-butyl alcohol.
Created	0	0	n/a	n/a	Increase in amount of purge solvent sent to recycling, resulted in a decreased air release.
Contained in Product	0	0	n/a	n/a	
Released to Air	113.3	98.0	(-)15.274	-13%	
Released to Water	0.0	0	n/a	n/a	
Transfer for Disposal	2.5	2.620	0.109	4%	Increase in production and usage of spray coatings containing n-butyl alcohol resulted in an increase in disposal.
Transfer for Recycle	36.6	64.03	27.466	75%	Increased number of line cleanings in 2019 resulted in an increased quantity of n-butyl alcohol recovered in the spent purge solvent.
Sodium nitrite					
Used	>10 to 100	>10 to 100	(-)>1 to 10	-10%	Decreased usage of sodium nitrite.
Created	0	0	n/a	n/a	
Contained in Product	>0 to 1	>0 to 1	(-)>0 to 1	-23%	
Released to Air	n/a	n/a	n/a	n/a	No significant change in air releases.
Released to Water	10.785	9.72	(-)1.060	-10%	Decreased usage of sodium nitrite in phosphate coat and released to water.
Transfer for Disposal	0.003	0.002	(-)0.001	-23%	Decrease in general use products containing sodium nitrite.
Transfer for Recycle	n/a	n/a	n/a	n/a	
Sulphuric acid					

Substance/Category	Accounting Quantities				Reason for Change
	2018	2019	Annual Comparison		
	(tonne)	(tonne)	(tonne)	(%)	
Used	n/a	n/a	>10 to 100	>100%	Usage of sulphuric acid is based on purchase quantities, which in 2019 resembles typical levels. However, 2019 quantities represent a large increase from 2018 purchase quantities which were unusually low due to an acid tank replacement project in 2018 and usage of 2017 purchase quantities through the 2018 calendar year.
Created	n/a	0	n/a	n/a	
Contained in Product	n/a	0	n/a	n/a	
Released to Air	n/a	0	n/a	n/a	Sulphuric acid is neutralized on use, resulting in no change in air releases, off-site disposals and off-site recycles.
Released to Water	n/a	0	n/a	n/a	
Transfer for Disposal	n/a	0	n/a	n/a	
Transfer for Recycle	n/a	0	n/a	n/a	
1,2,4-Trimethylbenzene					
Used	>100 to 1,000	>100 to 1,000	>10 to 100	17%	Increased production and usage of spray coatings, purge solvents and general use products containing 1,2,4-Trimethylbenzene.
Created	n/a	n/a	n/a	n/a	
Contained in Product	n/a	n/a	n/a	n/a	
Released to Air	107.9	136.7	28.781	27%	
Released to Water	n/a	n/a	n/a	n/a	
Transfer for Disposal	2.2	2.471	0.297	14%	
Transfer for Recycle	75.7	78.39	2.656	4%	Increased number of line cleanings in 2019 resulted in an increased quantity of 1,2,4-TMB recovered in the spent purge solvent.
Xylene					
Used	>100 to 1,000	>100 to 1,000	>10 to 100	20%	Increased production and usage of products containing xylene.

Substance/Category	Accounting Quantities				Reason for Change
	2018	2019	Annual Comparison		
	(tonne)	(tonne)	(tonne)	(%)	
Created	0	0	n/a	n/a	
Contained in Product	0	0	n/a	n/a	
Released to Air	71.9	87.79	15.917	22%	
Released to Water	n/a	n/a	n/a	n/a	
Transfer for Disposal	0.1	0.104	0.015	16%	
Transfer for Recycle	213.0	253.6	40.658	19%	Increased number of line cleanings in 2019 resulted in an increased quantity of xylene recovered in the spent purge solvent.
Zinc (and its compounds)					
Used	>1,000 to 10,000	>1,000 to 10,000	>100 to 1000	7%	Increased in production and usage of products containing zinc in phosphate coating and sealer departments.
Created	0	0	n/a	n/a	
Contained in Product	>1,000 to 10,000	>1,000 to 10,000	>100 to 1000	7%	
Released to Air	0.0002	0.0002	0.000	7%	No significant change in air release.
Released to Water	0.138	0.137	(-)0.002	-1%	No significant change in water release.
Transfer for Disposal	0.216	0.173	(-)0.043	-20%	Decrease in phosphate sludge disposal quantity.
Transfer for Recycle	9.949	8.293	(-)1.656	-17%	Decrease in WWTP sludge quantity and decrease in scrap metal recycle quantity.
NO_x					
Used	0	0	n/a	n/a	No significant change in creation or air releases.
Created	>10 to 100	>10 to 100	>1 to 10	1%	
Released to Air	67.20	70.06	2.857	4%	
CO					
Used	0.00	0	n/a	n/a	No significant change in creation or air releases.
Created	>10 to 100	>10 to 100	>1 to 10	2%	
Released to Air	57.91	60.57	2.656	5%	

Substance/Category	Accounting Quantities				Reason for Change
	2018	2019	Annual Comparison		
	(tonne)	(tonne)	(tonne)	(%)	
PM_{10}					
Used	0	0	n/a	n/a	No significant change in creation or air releases.
Created	>100 to 1,000	>100 to 1,000	(-)1 to 10	-5%	
Released to Air	14.48	13.69	(-)0.786	-5%	
$PM_{2.5}$					
Used	0	0	n/a	n/a	No significant change in creation or air releases.
Created	>10 to 100	>10 to 100	(-)1 to 10	-5%	
Released to Air	3.954	3.868	(-)0.085	-2%	
Butane					
Used	0	0	n/a	n/a	No significant change in creation or air releases.
Created	>1 to 10	>1 to 10	>0 to 1	5%	
Released to Air	1.384	1.452	0.066	5%	
Heavy aromatic solvent naphtha					
Used	>10 to 100	>10 to 100	>1 to 10	5%	Increased production and usage of products containing HASN.
Created	>0 to 1	>0 to 1	n/a	n/a	
Released to Air	8.714	9.124	0.410	5%	
Hexane					
Used	0	0	n/a	n/a	No significant change in creation or air releases.
Created	>1 to 10	>1 to 10	>0 to 1	5%	
Released to Air	1.188	1.244	0.056	5%	
Hydrotreated heavy naphtha					
Used	>10 to 100	>10 to 100	>1 to 10	3%	Increased production and usage of products containing HHN.
Created	0	0	n/a	n/a	
Released to Air	5.862	6.062	0.201	3%	
Hydrotreated light distillate					
Used	>1 to 10	>1 to 10	(-)>0 to 1	-12%	Decreased usage of general use products and WWTP chemicals containing HLD.
Created	n/a	n/a	n/a	n/a	
Released to Air	1.956	1.485	-0.471	-24%	

Substance/Category	Accounting Quantities				Reason for Change
	2018	2019	Annual Comparison		
	(tonne)	(tonne)	(tonne)	(%)	
Light aromatic solvent naphtha					
Used	>100 to 1,000	>100 to 1,000	>10 to 100	19%	Increase in production and usage of spray coatings, purge solvents and general use products containing LASN.
Created	0	0	n/a	n/a	
Released to Air	37.93	44.94	7.015	18%	
Methyl ethyl ketone					
Used	n/a	>1 to 10	>0 to 1	20%	Increased number of line cleanings in 2019 resulted in an increased usage of purge solvent containing MEK which triggers reporting of MEK for the 2019 reporting year.
Created	n/a	0	n/a	n/a	
Released to Air	n/a	1.098	0.371	51%	
n-Butyl acetate					
Used	>100 to 1,000	>100 to 1,000	>10 to 100	18%	Increased production and increased number of line cleanings in 2019 resulted in an increased usage of n-butyl acetate.
Created	0	0	n/a	n/a	Increase in quantity of n-butyl acetate recovered in the spent purge solvent, results in a minor decrease in air release.
Released to Air	55.46	51.46	(-)4.000	-7%	
n-Heptane					
Used	>10 to 100	>10 to 100	>1 to 10	3%	Increased production and usage of products containing n-heptane.
Created	0	0	n/a	n/a	
Released to Air	12.28	12.611	0.333	3%	
Pentane					
Used	0	0	n/a	n/a	No significant change in creation or air releases.
Created	>1 to 10	>1 to 10	>0 to 1	5%	
Released to Air	1.715	1.797	0.082	5%	
Propane					
Used	0	0	n/a	n/a	No significant change in creation or air releases.
Created	>1 to 10	>1 to 10	>0 to 1	5%	
Released to Air	1.056	1.106	0.050	5%	

Substance/Category	Accounting Quantities				Reason for Change
	2018	2019	Annual Comparison		
	(tonne)	(tonne)	(tonne)	(%)	
Solvent Naphtha Medium Aliphatic					
Used	1.957	2.328	>0 to 1	19%	Increase in the usage of general use products containing SNMA.
Created	n/a	n/a	n/a	n/a	
Released to Air	1.857	2.220	0.363	20%	
Toluene					
Used	>1 to 10	>1 to 10	>0 to 1	12%	Slight increase in general use products containing toluene.
Created	0	0	n/a	n/a	
Released to Air	1.248	1.353	0.105	8%	
Trimethylbenzene					
Used	>10 to 100	>10 to 100	>1 to 10	8%	Increased production and usage of spray coatings, purge solvents and general use products containing 1,2,4-Trimethylbenzene.
Created	0	0	n/a	n/a	
Released to Air	40.43	43.47	3.047	8%	

C. TOXIC SUBSTANCE REDUCTION PLANNING

Objectives & Targets

Substance	Objectives & Targets	Reduction Option Progress
Asbestos	n/a – no options identified	Asbestos was not reportable for 2015, 2016, 2017, 2018 and 2019 reporting years.
Di-2-ethylhexyl phthalate	n/a – no options identified	
Ethylbenzene	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Ethylene glycol	n/a – no options identified	
Ethylene glycol monobutyl ether	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Isobutyl alcohol	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed. Isobutyl alcohol was not reportable for 2016, 2017, 2018 and 2019 reporting years.
Isopropanol	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Manganese (and its compounds)	n/a – no options identified	Manganese (and its compounds) was not reportable for 2015, 2016, 2017, 2018 and 2019 reporting years.
Methyl alcohol	n/a – no options identified	
Methyl isobutyl ketone	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Nitric acid	n/a – no options identified	

Substance	Objectives & Targets	Reduction Option Progress
n-Butyl alcohol	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Sodium nitrite	n/a – no options identified	
Sulphuric acid	n/a – no options identified	
Toluene	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed. Toluene was not reportable as a Part 1 substance for 2016, 2017, 2018 and 2019 reporting years. Reportable as a Part 5 VOC.
1,2,4-Trimethylbenzene	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Xylene	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Zinc (and its compounds)	n/a – no options identified	
NO_x	– Reduce the use of natural gas in process and heating combustion equipment.	Continued to implement the steps in the plan.
CO	– Reduce the use of natural gas in process and heating combustion equipment.	Continued to implement the steps in the plan.
PM_{10}	– Reduce the use of spray coatings.	Continued to increase block size.
$PM_{2.5}$	– Reduce the use of spray coatings.	Continued to increase block size.
Butane	– Reduce the use of natural gas in process and heating combustion equipment.	Continued to implement the steps in the plan.
Diethylene glycol monobutyl ether	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed. Diethylene glycol monobutyl ether was not reportable for 2016 2017, 2018 and 2019 reporting years.

Substance	Objectives & Targets	Reduction Option Progress
Ethylene glycol monobutyl ether acetate	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed. EGMEA is no longer an NPRI and TRA substance.
Heavy aromatic solvent naphtha	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Hexane	– Reduce the use of natural gas in process and heating combustion equipment.	Continued to implement the steps in the plan.
Hydrotreated heavy naphtha	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Hydrotreated light distillate	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Light aromatic solvent naphtha	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Methyl ethyl ketone	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
n-Butyl acetate	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
n-Heptane	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.

Substance	Objectives & Targets	Reduction Option Progress
Pentane	– Reduce the use of natural gas in process and heating combustion equipment.	Continued to implement the steps in the plan.
Propane	– Reduce the use of natural gas in process and heating combustion equipment.	Continued to implement the steps in the plan.
Solvent naphtha medium aliphatic	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	Continued to implement the steps in the plan.
Tetrahydrofuran	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed. Tetrahydrofuran was not reportable for the 2014 through 2019 reporting years.
Trimethylbenzene	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed.
Acetone	– Continue to transition to low VOC booth cleaners. – Continue to increase block size. – Continue to implement "lockout" practice on all valves in the paint booths.	The planned steps were completed. Acetone was not reportable for 2016, 2017 and 2018 reporting years. O. Reg. 127 was rescinded in 2019 and acetone is no longer a reportable substance under TRA.

Annual Report Certification Statement

As of June 24, 2020, I certify that I have read the report(s) on the toxic substance reduction plan(s) for the toxic substances included above, and am familiar with its/their contents and to my knowledge the information contained in the report(s) is factually accurate and the report complies/reports comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

Ron Prahin, Plant Manager

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(Digital signature on file)