



Report:

Thomson-Gordon Group Inc. Toxic Reduction Summary Report

Date: December 4, 2012



TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

Substance Name and cas #	p,p'-Methylenebis(2-chloroaniline), cas #: 101-14-4
Facility Identification and Site Address	
Legal Company Name:	Thomson-Gordon Group Inc.
Facility Name:	Thomson-Gordon Group-Thordon Bearing
Facility Address:	3225 Mainway, Burlington, Ontario L7M 1A6
Facility Mailing Address (if different):	Same as above
Spatial Coordinates of Facility:	Latitude: 43.3630 Longitude -79.804
Number of Full-time Employees:	102
Facility NPRI ID:	2250
Ontario MOECC ID Number (if assigned):	NA
2 Digit NAICS Code:	32
4 Digit NAICS Code:	3261
6 Digit NAICS Code:	326150 - Urethane & Miscellaneous Foam Product Mfg
Parent Company Information	
Name of Parent Company:	Thomson-Gordon Group Inc.
Address of Parent Company:	3225 Mainway, Burlington, Ontario L7M 1A6
Percentage Ownership of Facility:	100%
Company Contact Information	
Public Contact Name:	Tariq Masud, P.Eng
Position / Title:	Manufacturing & Maintenance Manager
Telephone:	(905) 355-1440
Substances for Which Other Plans Have Been Prepared (Name, cas#)	
Toluene-2,4-diisocyanate, cas # 584-84-9 Toluenediisocyanate (mixed isomers), cas# 26471-62-5	



TOXIC REDUCTION POLICY STATEMENT OF INTENT

p,p'-Methylenebis(2-chloroaniline), CAS# 101-14-4 commonly referred to as MOCA is currently used by TGGI in manufacturing of elastomer tubes. TGGI intends to investigate several potential reduction options over the next 5 years and will undertake best efforts to complete reduction efforts within this plan timeframe. The facility does not create or transfer MOCA in products; therefore this plan will not address reducing its creation or transfer.

REDUCTION OBJECTIVES:

TGGI will strive to reduce and possibly eliminate the use of MOCA 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 SUBSTANCE

p,p'-Methylenebis(2-chloroaniline), CAS# 101-14-4 commonly referred to as MOCA is currently used by TGGI in manufacturing of elastomer tubes.

TOXIC SUBSTANCE REDUCTION OPTION(S) TO BE IMPLEMENTED

To reduce the use of p,p'-Methylenebis(2-chloroaniline) at the facility, TGGI plans to implement additional operator training measures which will reduce the use of this substances.

Anticipated Reductions from implementation of option listed above:

Option(s)	Estimate of Reduction kg / (%)										
	Used	Created	On-Site Releases			Disposal		Transferred (recycling)	Contained in product	Transformed	Destroyed
			Air	Land	Water	On-Site	Off-Site				
Option 5: Training - Scrap Reduction Operator training to reduce machine errors and scrap.	144.64 0.2%		0.01 0.2%								144.63 0.2%
Anticipated Dates for Reduction:	Dec-13		Dec-13								Dec-13

PLAN SUMMARY STATEMENT

This plan summary accurately reflects the content of the toxic substance reduction plan for:

- p,p'-Methylenebis(2-chloroaniline), cas #: 101-14-4

Prepared for Thomson-Gordon Group Incorporated, December 4, 2012.



CERTIFICATION STATEMENTS

ORTECH Environmental

**Preparation of a Toxic Reduction Plan
for Thomson-Gordon Group Inc.**

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9. PLAN CERTIFICATION FOR MOCA

As of December 4, 2012, I, Terry McGowan, 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.

p,p'-Methylenebis(2-chloroaniline): cas#101-14-4

Terry McGowan, P.Eng.
President
Thomson Gordon Group Inc. (TGGI)

Dec. 4/12

Date

As of December 4, 2012, I, Scott Manser certify that I am familiar with the processes at TGGI that use or create the toxic substance referred to above, 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 November 30, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Scott Manser, P.Eng
Senior Project Manager
ORTECH Environmental
Toxic Substance Reduction Planner License No. TSRP0071

December 4, 2012
Date