THOMSON-GORDON GROUP

Report:

Thomson-Gordon Group Inc.
2015 Toxic Reduction Accounting Report

Date: May 6, 2016

3225 Mainway, Burlington, Ontario, Canada L7M 1A6 TEL (905)335-1440 FAX (905)335-4033

1. SUMMARY

Thomson-Gordon Group Inc. (TGGI) is providing this Toxic Reduction Accounting Report to fulfill its annual Toxic Reduction Act (TRA) and Ontario Regulation 455/09 public reporting requirements for the 2015 reporting year. Under these requirements the facility is required to undertake toxic substance accounting to better understand the quantities of toxic substances that are used, created, transformed, destroyed, released, and disposed of.

Facility Description:
TGGI is engaged in the manufacturing of wear surfaces utilizing a unique polymer alloy. Operations at the facility are represented by NAICS code 326150 (Urethane & Miscellaneous Foam Product Mfg.).

2. FACILITY INFORMATION

Facility Name:	Thomson-Gordon Group-Thordon Bearing
NPRI Identification Number:	2250
O.Reg 127/01 Identification Number:	NA
Two Digit NAICS Code:	32
Four Digit NAICS Code :	3261
Six Digit NAICS Code :	326150 - Urethane & Miscellaneous Foam Product Mfg
Number of Full-time Employees:	125
UTM Spatial Coordinates (NAD83):	Latitude: 43.3630 Longitude: -79.8046 Datum: 1983

2.1. Owner of the Facility Information

Name:	Thomson-Gordon Group Inc.
Address:	3225 Mainway, Burlington, Ontario L7M 1A6
Phone Number:	(905) 355-1440
Fax Number:	(905) 355-4033
E-mail:	NA

2.2. Operator of the Facility Information

Name:	Thomson-Gordon Group Inc.
Address:	3225 Mainway, Burlington, Ontario L7M 1A6
Phone Number:	(905) 355-1440
Fax Number:	(905) 355-4033
E-mail:	NA

2.3. Parent Company Information

Legal Name of Parent Company:	Thomson-Gordon Group Inc.
Address of Parent Company:	3225 Mainway, Burlington, Ontario L7M 1A6
% of Facility Owned by Company:	100%

3225 Mainway, Burlington, Ontario, Canada L7M 1A6 TEL (905)335-1440 FAX (905)335-4033

2.4. Toxic Substances for Which Facility Must Report:

Substance 1:	Toluene-2,4-diisocyanate, TRA Plan 12/21/2015 CAS Number: 584-84-9
Substance 2:	Toluenediisocyanate (mixed isomers), TRA Plan 12/21/2015 CAS Number: 26471-62-5
Substance 3:	p,p'-Methylenebis(2-chloroaniline), TRA Plan 12/4/2015 CAS Number: 101-14-4

2.5. Plan Contacts

Person Coordinating the Preparation of the Plan

Name:	Tariq Masud, P.Eng.
Position:	Manufacturing & Maintenance Manager
Address:	3225 Mainway, Burlington, Ontario L7M 1A6
Phone Number:	(905) 355-1440
Fax Number:	(905) 355-4033
E-mail:	tariqm@thomson-gordon.com

Facility Details

Review of quantification methods and a rationale if the methodology has changed from previous reports, including a description of how the change affects tracking and quantification of the substance:
There have been no changes in the methodology from the previous reporting year.

A statement of whether there has been a significant process change at the facility during the previous calendar year:
There have been no significant process changes at the facility during 2015.

Progress towards toxic substance reductions:
Toxic reduction options for p,p'-Methylenebis(2-chloroaniline) were implemented and completed during 2013. Actions towards toxic reductions for Toluene-2,4-diisocyanate and Toluenediisocyanate (mixed isomers) consisting of equipment/process modification were implemented during 2015. These actions are on-going through the pilot program.

Substance Information and Certification:
Provided in Sections 3 and 4.

3225 Mainway, Burlington, Ontario, Canada L7M 1A6 TEL (905)335-1440 FAX (905)335-4033

3. STATEMENT OF INTENT AND OBJECTIVES:

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.

Objective: 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. Under the requirements of O.Reg 455/09 a summary of recommendations on improvements to the Toxic Reduction Plan is provided. Certification of the plan, both by the Certified Planner and the operating facilities highest ranking company official is provided within this report.

Statement of Intent: Toluene-2,4-diisocyanate (cas# 584-84-9) is currently used by TGGI as one part of a reactant in the manufacturing of cast polyurethane bearings. TGGI intends to investigate several potential reduction options over the next 5 years but is unable to commit to reductions within this plan timeframe. The facility does not create, transfer or contain Toluene-2-4-diiocyanate in products; therefore this plan will not address reducing its creation, transfer or contained in product.

Objective: TGGI will strive to reduce and possibly eliminate the use of Toluene-2,4-diisocyanate (cas# 584-84-9) 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.

Statement of Intent: Toluenediisocyanate (mixed isomers) (cas# 26471-62-5) are currently used by TGGI as one part of a reactant in the manufacturing of cast polyurethane bearings. TGGI intends to investigate several potential reduction options over the next 5 years but is unable to commit to reductions within this plan timeframe. The facility does not create, transfer or contain Toluenediisocyanate (mixed isomers) (cas# 26471-62-5) in products; therefore this plan will not address reducing its creation, transfer or contained in product.

Objective: TGGI will strive to reduce and possibly eliminate the use of Toluenediisocyanate (mixed isomers) (cas# 26471-62-5) 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.

3225 Mainway, Burlington, Ontario, Canada L7M 1A6 TEL (905)335-1440 FAX (905)335-4033

COMPARISON OF TOXIC SUBSTANCE ACCOUNTING

cas #	Substance	Year	Amount of Substance (MT)			Releases (MT)		Off-Site Transfers (MT)			Amount of Substance Contained in Product (kg)
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling	
101-14-4	p,p'-Methylenebis(2-chloroaniline),	2015	10 - 100	0	0	0.0033	0	0	0	0	0
		2014	10 - 100	0	0	0.0032	0	0	0	0	0
Change Between 2014 - 2013 (MT)			1-10	0	0	0.0001	0	0	0	0	0
% Change From 2014			3%	0%	0%	3%	0%	0%	0%	0%	0%
Reason for Change / Comments:			NC	NC	NC	NC	NC	NC	NC	NC	NC

NC - No Change in Reported Quantities (Less Than 10% or Small Quantity)

cas #	Substance	Year	Amount of Substance (kg)			Releases (kg)		Off-Site Transfers (kg)			Amount of Substance Contained in Product (kg)
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling	
584-84-9	Toluene-2,4-diisocyanate	2015	10 - 100	0	0	0.0008	0	0	0	0	0
		2014	100-1,000	0	0	0.0027	0	0	0	0	0
Change Between 2014 - 2013 (kg)			230	NA	NA	-0.0019	NA	NA	NA	NA	NA
% Change From 2013			-70%	NA	NA	-70%	NA	NA	NA	NA	NA
Reason for Change / Comments:			A	NA	NA	A	NA	NA	NA	NA	NA

NA – Not applicable, first reporting year A – Changes in production quantities

cas #	Substance	Year	Amount of Substance (kg)			Releases (kg)		Off-Site Transfers (kg)			Amount of Substance Contained in Product (kg)
			Substance Used (Input)	Created (Process)	Substance Destroyed (Process)	Air	Water (Municipal Treatment)	Land Disposals	Incineration	Recycling	
26417-62-5	Toluenediisocyanate (mixed isomers)	2015	1,000 - 10,000	0	0	0.061	0	0	0	0	0
		2014	1,000-10,000	0	0	0.057	0	0	0	0	0
Change Between 2014 - 2013 (kg)			0.6	NA	NA	0.004	NA	NA	NA	NA	NA
% Change From 2013			9%	NA	NA	9%	NA	NA	NA	NA	NA
Reason for Change / Comments:			A	NA	NA	A	NA	NA	NA	NA	NA

NA – Not applicable, first reporting year A – Changes in production quantities

4. ACCOUNTING CERTIFICATION

Substance 1: Toluene-2,4-diisocyanate, TRA Plan 12/21/2015
CAS Number: 584-84-9
Substance 2: Toluenediisocyanate (mixed isomers), TRA Plan 12/21/2015
CAS Number: 26471-62-5
Substance 3: p,p'-Methylenebis(2-chloroaniline), TRA Plan 12/4/2015
CAS Number: 101-14-4

As of January 12th 2016, I certify that I have read the report on the above referenced toxic substance, and I am familiar with its contents and to my knowledge the information contained in the report are factually accurate and the report complies with the Toxic Reductions Act, 2009 and Ontario Regulation 455/09 (General) made under the Act.

Signed: 

Highest Ranking Employee:	Terry McGowan
Position:	President
Telephone:	905-335-1440

3225 Mainway, Burlington, Ontario, Canada L7M 1A6 TEL (905)335-1440 FAX (905)335-4033

ATTACHMENT 1

Public Report Checklist
(1 page)

3225 Mainway, Burlington, Ontario, Canada L7M 1A6 TEL (905)335-1440 FAX (905)335-4033

2015 Toxic Substance Act: Public Report Checklist

Details	
Substance name and CAS number	☒
NPRI and O.Reg.127/01 MOE ID numbers	☒
The legal and trade names of the owner and the operator of the facility, the street address of the facility and, the mailing address of the facility (if different)	☒
The number of full-time employee equivalents at the facility.	☒
North American Industry Classification System (NAICS) codes for the facility	☒
The name, position, telephone number for street address and mailing address for:	☒
Public contact	☒
For parent companies:	☒
Legal name	☒
Street and mailing address of the company	☒
The company's percentage of ownership	☒
The name of all other toxic substances used or created at the facility for which plans are required to be prepared.	☒
Review of quantification methods and a rationale if the methodology has changed from previous reports, including a description of how the change affects tracking and quantification of the substance (summary only for public)	☒
A statement of whether there has been a significant process change at the facility during the previous calendar year.	☒
The amount of the substance used (ranges for public report)	☒
The amount of the substance that is created. (ranges for public report)	☒
The quantity released to air	☒
The quantity released to surface waters	☒
The quantity released to land	☒
The quantity disposed of on-site to land	☒
The quantity transferred off-site for disposal	☒
The quantity transferred off-site for treatment prior to final disposal	☒
The quantity transferred off-site for recycling	☒
Amount contained in product (not required for CACs and VOCs) (ranges for public report)	☒
Certification of Highest Ranking Employee (copy for public report)	☒

3225 Mainway, Burlington, Ontario, Canada L7M 1A6 TEL (905)335-1440 FAX (905)335-4033