

Report:

Thomson-Gordon Group Inc. 2019 Toxic Reduction Accounting Report

Date: March 24, 2020

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 2019 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: | 115 |
| 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% |

2.4. Toxic Substances for Which Facility Must Report:

| | |
|----------------------------|--|
| Substance 1: 12/21/2015 | Toluenediisocyanate (mixed isomers), TRA Plan CAS Number: 26471-62-5 |
| Substance 2: | 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: | Melissa Jia |
| Position: | NPD Polymer Scientist / Project Leader |
| Address: | 3225 Mainway, Burlington, Ontario L7M 1A6 |
| Phone Number: | (905) 355-1440 |
| Fax Number: | (905) 355-4033 |
| E-mail: | melissaj@thordonbearings.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 2019.

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 Toluenediisocyanate (mixed isomers) consisting of equipment/process modification were implemented during 2015. These actions are on-going through the pilot program. Toluene-2,4-diisocyanate was below the reporting thresholds for 2015, 2016 and 2017 and an exit record for the 2018 was filed for this substance.

Substance Information and Certification:

Provided in Sections 3 and 4.

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: 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.

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), | 2019 | 10 - 100 | 0 | 0 | 0.0028 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | 2018 | 10 - 100 | 0 | 0 | 0.0029 | 0 | 0 | 0 | 0 | 0 | 0 |
| Change Between 2019 - 2018 (MT) | | | 9 | 0 | 0 | 0.0001 | 0 | 0 | 0 | 0 | 0 | 0 |
| % Change From 2018 | | | 18% | 0% | 0% | 3.4% | 0% | 0% | 0% | 0% | 0% | 0% |
| Reason for Change / Comments: | | | A | NC | NC | NC | NC | NC | NC | NC | NC | NC |

A - Changes in Production Levels

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 | | |
| 26417-62-5 | Toluenediisocyanate (mixed isomers) | 2019 | 1,000 - 10,000 | 0 | 0 | 0.065 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | 2018 | 1,000 - 10,000 | 0 | 0 | 0.059 | 0 | 0 | 0 | 0 | 0 | 0 |
| Change Between 2019 - 2018 (kg) | | | 1,498 | 0 | 0 | 0.006 | 0 | 0 | 0 | 0 | 0 | 0 |
| % Change From 2018 | | | 26% | 0% | 0% | 10% | 0% | 0% | 0% | 0% | 0% | 0% |
| Reason for Change / Comments: | | | B | NC | NC | B | NC | NC | NC | NC | NC | NC |

A - Changes in production quantities B - Updated Material Composition (Safety Data Sheet)

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

4. ACCOUNTING CERTIFICATION

Substance 1: Toluenediisocyanate (mixed isomers), TRA Plan 12/21/2015

CAS Number: 26471-62-5

Substance 2: p,p'-Methylenebis(2-chloroaniline), TRA Plan 12/4/2015

CAS Number: 101-14-4

As of May 7, 2020, 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:


Terry McGowan, President

ATTACHMENT 1

**Public Report Checklist
(1 page)**



Reporting Year 2019 Toxic Substance Act: Public Report Checklist

| Details | <input checked="" type="checkbox"/> |
|---|-------------------------------------|
| Substance name and CAS number | <input checked="" type="checkbox"/> |
| NPRI and O.Reg. 127/01 MOE ID numbers | <input checked="" type="checkbox"/> |
| 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) | <input checked="" type="checkbox"/> |
| The number of full-time employee equivalents at the facility. | <input checked="" type="checkbox"/> |
| North American Industry Classification System (NAICS) codes for the facility | <input checked="" type="checkbox"/> |
| The name, position, telephone number for street address and mailing address for: | <input checked="" type="checkbox"/> |
| Public contact | <input checked="" type="checkbox"/> |
| For parent companies: | <input checked="" type="checkbox"/> |
| Legal name | <input checked="" type="checkbox"/> |
| Street and mailing address of the company | <input checked="" type="checkbox"/> |
| The company's percentage of ownership | <input checked="" type="checkbox"/> |
| The name of all other toxic substances used or created at the facility for which plans are required to be prepared. | <input checked="" type="checkbox"/> |
| 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) | <input checked="" type="checkbox"/> |
| A statement of whether there has been a significant process change at the facility during the previous calendar year. | <input checked="" type="checkbox"/> |
| The amount of the substance used (ranges for public report) | <input checked="" type="checkbox"/> |
| The amount of the substance that is created. (ranges for public report) | <input checked="" type="checkbox"/> |
| The quantity released to air | <input checked="" type="checkbox"/> |
| The quantity released to surface waters | <input checked="" type="checkbox"/> |
| The quantity released to land | <input checked="" type="checkbox"/> |
| The quantity disposed of on-site to land | <input checked="" type="checkbox"/> |
| The quantity transferred off-site for disposal | <input checked="" type="checkbox"/> |
| The quantity transferred off-site for treatment prior to final disposal | <input checked="" type="checkbox"/> |
| The quantity transferred off-site for recycling | <input checked="" type="checkbox"/> |
| Amount contained in product (not required for CACs and VOCs) (ranges for public report) | <input checked="" type="checkbox"/> |
| Certification of Highest Ranking Employee (copy for public report) | <input checked="" type="checkbox"/> |

