



Report:

Thomson-Gordon Group Inc. Toxic Reduction Summary Report

Date: December 21, 2015



TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

Substance Name and cas #	Toluene-2,4-diisocyanate, cas# 584-84-9 Toluenediisocyanate (mixed isomers), cas# 26471-62-5	
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#)		
p,p'-Methylenebis(2-chloroaniline), cas # 101-14-4		



TOXIC REDUCTION POLICY 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-diisocyanate in products; therefore this plan will not address reducing its creation, transfer or contained in product.

REDUCTION OBJECTIVES:

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.

DESCRIPTION OF SUBSTANCE

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.

TOXIC REDUCTION POLICY 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.

REDUCTION OBJECTIVES:

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.

DESCRIPTION OF SUBSTANCE

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.

TOXIC SUBSTANCE REDUCTION OPTION(S) TO BE IMPLEMENTED

To reduce the use of TDI at the facility, TGGI plans to implement one (1) option (Equipment or Process Modification) which will reduce the use of these substances



Anticipated Reductions from implementation of option listed above:

Toluene-2,4-diisocyanate (kg)		Estimate of Reduction kg / (%)									
Option #3: Reduce Cut End Length	Used	Created	On-Site Releases			Disposal		Transferred (recycling)	Contained in product	Transformed	Destroyed
			Air	Land	Water	On-Site	Off-Site				
Step 1	3.28 / 1%		0.00 / 1%								3.28 / 1%
Anticipated Dates for Reduction	Jan 2016		Jan 2016								Jan 2016
Step 2	6.56 / 2%		0.00 / 2%								6.56 / 2%
Anticipated Dates for Reduction	Jan 2017		Jan 2017								Jan 2017
Step 3	6.56 / 2%		0.00 / 2%								6.56 / 2%
Anticipated Dates for Reduction	Mar 2018		Mar 2018								Mar 2018

Toluenediisocyanate (mixed isomers) (kg)		Estimate of Reduction kg / (%)									
Option #3: Reduce Cut End Length	Used	Created	On-Site Releases			Disposal		Transferred (recycling)	Contained in product	Transformed	Destroyed
			Air	Land	Water	On-Site	Off-Site				
Step 1	68.85 / 1%		0.00 / 1%								68.85 / 1%
Anticipated Dates for Reduction	Jan 2016		Jan 2016								Jan 2016
Step 2	137.70 / 2%		0.00 / 2%								137.70 / 2%
Anticipated Dates for Reduction	Jan 2017		Jan 2017								Jan 2017
Step 3	137.70 / 2%		0.00 / 2%								137.70 / 2%
Anticipated Dates for Reduction	Mar 2018		Mar 2018								Mar 2018

PLAN SUMMARY STATEMENT

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

- Toluene-2,4-diisocyanate, cas# 584-84-9
- Toluenediisocyanate (mixed isomers), cas# 26471-62-5

Prepared for Thomson-Gordon Group Incorporated, December 21, 2015.



CERTIFICATION STATEMENTS



9. PLAN CERTIFICATION FOR TDI:

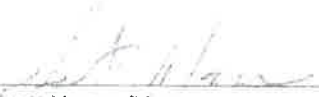
As of December _____, 2015 I, Terry McGowan, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

- Toluene 2,4-diisocyanate (cas #584 84-9)
- Tolucenediisocyanate (mixed isomers) (cas# 26471-62-5)


 Terry McGowan
 President, Thomson Gordon Group Incorporated (TGGI)

December 21/15
 Date

As of December 21, 2015, 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 December 21, 2015 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 Consulting Inc.
 Toxic Substance Reduction Planner License No. TSRP0071

December 21, 2015
 Date