

BRAMPTON PROCESSING

171 ADVANCE BLVD., UNITS 19 & 20, BRAMPTON, ONTARIO L6T 4Z6

TOXICS REDUCTION ACT TOXIC SUBSTANCE REDUCTION PLAN SUMMARIES 2012

REPORT PREPARED BY:
O2E INC.

REPORT PREPARED FOR:
BRAMPTON PROCESSING

JANUARY 4, 2013

LONDON

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1. PLAN SUMMARY – CADMIUM (AND ITS COMPOUNDS)

Name and CASRN of Substance	Cadmium (and its compounds)	Not Applicable
Substances for which other plans have been prepared	Hexavalent Chromium (and its compounds)	Not Applicable
	Lead (and its compounds)	Not Applicable

1.1 Basic Facility Information

Basic facility information has been included in Section 4 of this document.

1.2 Toxic Reduction Policy Statement of Intent

Eco-citizenship is an integral part of Brampton Processing's corporate ethics. They strive to use natural resources efficiently and respect their environment by minimizing waste generation and impacts on the air, water and land. They respect the environment in their processes and products by sorting and reusing production wastes, by very tight management of their supply chain, by being as near as possible to their customers, and by offering green services to their clients.

Wherever feasible, Brampton Processing will reduce the use and release of Cadmium (and its compounds) in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Brampton Processing, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

1.3 Reduction Objectives

Brampton Processing's goal is to reduce the use and release of Cadmium (and its compounds) where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through the use of improving operating procedures to reduce drag out.

1.4 Description of Substance

Cadmium is contained in the anodes as well as the brush plating materials purchased by the facility.

1.5 Toxic Substance Reduction Option to be Implemented

The following option has been identified for implementation to reduce the use and release of Cadmium (and its compounds):

- Improved Operating Practices

Cadmium (and its compounds) reductions due to implementing the option above are as follows:

Company Name: Brampton Processing

Substance: Cadmium (and its compounds)

CASRN: Not applicable

Reduction Option: Improved Operating Practices

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	46.762	0	43.482	0.008	1.913	0	0	43.970	0
Estimated reduced amount	46.729	0	43.482	0.008	1.913	0	0	43.937	0
Reduction	0.033	0	0	0	0	0	0	0.033	0
% Reduction	0.07%	NA	NA	NA	NA	NA	NA	0.07%	NA

Note: All values are presented in kilograms (kg) per year unless noted.

1.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Cadmium (and its compounds), prepared on behalf of Brampton Processing, dated December 21, 2012.

1.7 Copy of Plan Certification

A copy of the plan certification is presented in Section 5 of this document.

2. PLAN SUMMARY – HEXAVALENT CHROMIUM (AND ITS COMPOUNDS)

Name and CASRN of Substance	Hexavalent Chromium (and its compounds)	Not Applicable
Substances for which other plans have been prepared	Cadmium (and its compounds)	Not Applicable
	Lead (and its compounds)	Not Applicable

2.1 Basic Facility Information

Basic facility information has been included in Section 4 of this document.

2.2 Toxic Reduction Policy Statement of Intent

Eco-citizenship is an integral part of Brampton Processing's corporate ethics. They strive to use natural resources efficiently and respect their environment by minimizing waste generation and impacts on the air, water and land. They respect the environment in their processes and products by sorting and reusing production wastes, by very tight management of their supply chain, by being as near as possible to their customers, and by offering green services to their clients.

Wherever feasible, Brampton Processing will reduce the use and release of Hexavalent Chromium (and its compounds) in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Brampton Processing, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

2.3 Reduction Objectives

Brampton Processing's goal is to reduce the use and release of Hexavalent Chromium (and its compounds) where technically and economically feasible by the timetable noted in the plan. We will achieve these reductions through the use of improving operating procedures to reduce drag out.

2.4 Description of Substance

Hexavalent Chromium (and its compounds) is contained in the chromic acid flakes, the Alodine and sodium dichromate purchased by the facility.

2.5 Toxic Substance Reduction Option to be Implemented

The following option has been identified for implementation to reduce the use and release of Hexavalent Chromium (and its compounds):

- Improved Operating Practices

Hexavalent Chromium (and its compounds) reductions due to implementing the option above are as follows:

Company Name: Brampton Processing
 Substance: Hexavalent (and its compounds)
 CASRN: Not applicable
 Reduction Option: Improved Operating Practices

	Used	Created	In Product	On-site Releases			Disposals		Recycling
				Air	Water	Land	On-site	Off-site	Off-site
Baseline	1031.012	0	824.000	0.906	0.640	0	0	253.000	0
Estimated reduced amount	1029.482	0	824.000	0.906	0.640	0	0	251.47	0
Reduction	1.53	0	0	0	0	0	0	1.53	0
% Reduction	0.1%	NA	NA	NA	NA	NA	NA	0.6%	NA

Note: All values are presented in kilograms (kg) per year unless noted.

2.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Hexavalent Chromium (and its compounds), prepared on behalf of Brampton Processing, dated December 21, 2102.

2.7 Copy of Plan Certification

A copy of the plan certification is presented in Section 5 of this document.

3. PLAN SUMMARY – LEAD (AND ITS COMPOUNDS)

Name and CASRN of Substance	Lead (and its compounds)	Not Applicable
Substances for which other plans have been prepared	Cadmium (and its compounds)	Not Applicable
	Hexavalent Chromium (and its compounds)	Not Applicable

3.1 Basic Facility Information

Basic facility information has been included in Section 4 of this document.

3.2 Toxic Reduction Policy Statement of Intent

Eco-citizenship is an integral part of Brampton Processing's corporate ethics. They strive to use natural resources efficiently and respect their environment by minimizing waste generation and impacts on the air, water and land. They respect the environment in their processes and products by sorting and reusing production wastes, by very tight management of their supply chain, by being as near as possible to their customers, and by offering green services to their clients.

Wherever feasible, Brampton Processing will reduce the use and release of Lead (and its compounds) in full compliance with all federal and provincial regulations. Toxic substance reduction will be an ongoing effort at Brampton Processing, and they will continue to monitor technological advancements to ensure that options that are both technologically and financially viable are implemented at their facility.

3.3 Reduction Objectives

Brampton Processing's goal is to reduce the use and release of Lead (and its compounds) where technically and economically feasible by the timetable noted in the plan. Brampton Processing has looked into all the options and currently found none to be feasible at this time. The facility will continue to monitor technological advancements to ensure that reduction options that are both technological and financially viable are implemented at our facility.

3.4 Description of Substance

Lead (and its compounds) is contained in the lead masking tape purchased by the facility.

3.5 Toxic Substance Reduction Option to be Implemented

There are currently no options identified for implementation to reduce the use and release of Lead (and its compounds).

3.6 Plan Summary Statement

This plan accurately reflects the content of the toxic substance reduction plan for Lead (and its compounds), prepared on behalf of Brampton Processing, dated December 21, 2012.

3.7 Copy of Plan Certification

A copy of the plan certification is presented in Section 5 of this document.

4. BASIC FACILITY INFORMATION

Facility Identification and Site Address		
Company Name	Brampton Processing	
Facility Name	Brampton Processing	
Facility Address	Physical Address:	Mailing Address
	171 Advance Blvd., Units 19 & 20, Brampton, ON L6T 4Z6	171 Advance Blvd., Units 19 & 20, Brampton, ON L6T 4Z6
Spatial Coordinates (UTM)	605495 (Easting)	4838784 (Northing)
Datum	WGS84	
Number of Employees	30 (Full time equivalents)	
NPRI ID	25027	
ON MOE ID	-	
Parent Company Information		
Parent Company Name & Address	Not applicable	
Percent Ownership		
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 Manufacturing	
4 Digit NAICS Code	3328 - Coating, Engraving, Heat Treating and Allied Activities	
6 Digit NAICS Code	332810 – Coating, Engraving & Heat Treating Activities	
Company Contact Information		
Facility Public Contact	Jelena Vucurovic ,Chemical Engineer	Contact Address
	Jelena.vucurovic@bramptonprocessing.ca	171 Advance Blvd., Units 19 & 20, Brampton, ON L6T 4Z6
	Phone: 905-791-9634	
	Fax: 905-791-4089	

5. COPY OF PLAN CERTIFICATION

Rationale Statement – Highest Ranking Employee

Submission of the required plan summaries and certification statements via the Environment Canada Single Window Information Manager (SWIM) system has been delayed as a result of the investigation and assessment of reduction options taking longer than anticipated to complete. Rather than compromise the integrity of the report and results by rushing the assessment to meet the deadline, we have chosen to take the time to properly evaluate all options we believe to be currently available for our operations. As such, submission of the required elements of the toxic substance reduction plans could not be made by the regulatory deadline.

Confirmation by the Highest Ranking Employee

As of January 3, 2013, I, Paul Cerveny, confirm that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and, with the exception of the regulatory deadline, comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Cadmium (and its compounds)
Lead (and its compounds)

Hexavalent Chromium (and its compounds)



Paul Cerveny
Plant Manager
Brampton Processing

Confirmation by Licensed Planner

As of January 3, 2013, I, Tim Logan confirm that I am familiar with the processes at Brampton Processing's facility that use or create the toxic substances referred to below, 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 plans dated December 21, 2012 and that the plans, with the exception of the regulatory deadline, comply with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substances:

Cadmium (and its compounds)
Lead (and its compounds)

Hexavalent Chromium (and its compounds)



, January 3, 2013

Tim Logan (License No. TSRP0003)
President
O2E Inc. Environmental Consultants