1. Basic Facility Information

Name & CAS # of Substance	Copper (and its compounds)	NA-06
Facility Identification and Site Address		
Company Name	Flex-N-Gate Howard	
Facility Name		
Facility Address	1425 Howard Avenue Windsor, ON N8X 5C9	
Spatial Coordination of Facility	4685398 N, 333318 E, Zone 17	
Number of Employees	300	
NPRI ID	11076	
Parent Company (PC) Information		
PC Name & Address **Percent Ownership for each PC**	NA	
Business Number for PC	NA	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	31-33 – Manufacturing	
4 Digit NAICS Code	3369 – Other transportation equipment manufacturing	
6 Digit NAICS Code	336390 – Other transportation equipment manufacturing	
Company Contact Information		
Facility Public Contact	Ms. Leanne Baarda, Quality Administrator	
	lbaarda@flexngate.com	
	Phone: (519) 258-3509 x10504	
	Fax: (519) 258-3238	
Facility Technical Contact:	Ms. Leanne Baarda, Quality Administrator	
	lbaarda@flexngate.com	
	Phone: (519) 258-3509 x10504	
	Fax: (519) 258-3238	
Company Coordinator Contact:	Ms. Leanne Baarda, Quality Administrator	
	lbaarda@flexngate.com	
	Phone: (519) 258-3509 x10504	
	Fax: (519) 258-3238	

Company Contact Information	
Person who Prepared the Plan: (if different from the Coordinator)	Pete Tremblay, EIT
	GHD Limited 184 Front Street East Toronto, ON M5A 4N3
	peter.tremblay@ghd.com
	Phone: (416) 360-1600
	Fax: (519) 884-0525
Highest Ranking Employee	Mr. Roger Verscheure, General Manager
	rverscheure@flexngate.com
	Phone: (519) 258-3509 EXT 502
	Fax: (519) 258-3238
Planner Responsible for Making Recommendations	Dana Lauder, P. Eng.
	GHD Limited 651 Colby Drive Waterloo ON N2V 1C2
	Planner License No: TSRP0014
	Dana.Lauder@ghd.com
	Phone: (519) 884-0510
	Fax: (519) 884-0525
Planner Responsible for Certification	Dana Lauder, P. Eng.
	Planner License No: TSRP0014
	Dana Lauder, P. Eng.
	Phone: (519) 884-0510
	Fax: (519) 884-0525

2. Plan Certification

Certification by Highest Ranking Employee

As of December 31, 2016, I, Roger Verscheure, certify that I have read the toxic substance reduction plan for the toxic substances 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.

Copper (and its compounds)

Roger Verscheure
General Manager
Flex-N-Gate Howard

Certification by Licensed Planner

As of December 31, 2016 I, Dana Lauder, certify that I am familiar with the processes at Flex N Gate Howard 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 plan dated December 31, 2016 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Copper (and its compounds)

Dana Lauder, P. Eng.
Licensed Toxic Reduction Planner, License # TSRP0014
GHD Limited

1. Introduction

1.1 Statement of Intent

The Flex-N-Gate (FNG) Howard facility (Facility) uses Copper (and its compounds), in five processes. The Facility does not intend to reduce the use of this toxic substance at the Facility.

1.2 Objectives

FNG is committed to continual improvement of its Environmental Management System (EMS), which includes waste minimization, the prevention of pollution, and compliance with all relevant federal, provincial and local environmental regulations. This plan will determine the technical and economic feasibility of each identified option to determine which, if any, are viable for implementation at this time. As part of the continuous improvement practices at the facility, technical advances will be monitored for new opportunities for reduction.

1.3 Facility Description

FNG manufactures automotive parts and related components. The North American Industry Classification System (NAICS) Code that applies to this Facility is 336390 – Other Motor Vehicle Part Manufacturing.

In 2015, the Facility operated their manufacturing process 24 hours per day, 7 days per week, 50 weeks per year.

2. Identification and Description

2.1 Stages and Processes

Copper is present in the metals and welding wires used in FNG's manufacturing operations. The stages and processes of the Facility's manufacturing operations are as follows:

- The raw materials are received at the Facility in the Sheet Metal and Weld Wire Receiving Stages. Raw materials include welding wire and coils of carbon sheet steel. The raw materials continue from the Sheet Metal and Weld Wire Receiving Stages to the designated staging area for processing. This process is further discussed in Sections 3.1 and 3.2.
- Coils of sheet steel from the Receiving Stages continue to the Stamping Process in the Production Stage where they are uncoiled, mechanically cut into the appropriate sizes and stamped into parts using heavy presses. This process is further discussed in Section 3.3.
- Metal parts from the Stamping Process are transferred to the Welding Process in the Production Stage where parts are either MIG welded or spot welded. In the MIG welding process, the sheet metal is joined together by applying current through the welding wire. In the spot welding process, sheet metal is joined together by applying electric current and pressure to particular spots. The Facility has several welding stations that are equipped with welding hoods