



CORPORATE OFFICE

415 Morton Drive, Windsor, Ont. N9J 3T8 P.O. Box 321187, Detroit, MI 48232-1187

TEL (519) 734-8464 FAX (519) 734-2000 U.S. (313) 962-1448

Toxic Substance Reduction Plan Summary

Centerline (Windsor) Limited Electrode Division 595 Morton Drive

December 20, 2012



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BASIC FACILITY INFORMATION						
Substances Included in the Plan						
■ Copper (and its compounds) (NA **)						
Facility Identification and Site Address						
Company Name		Centerline (Windsor) Limited				
Facility Name		Electrode Division (595 Morton Drive)				
		Physical Address:		Mailing Address:		
Facility Address		595 Morton Drive, Windsor, ON N9J 3T8		Same as physical address		
Spatial Coordinates of Facility		E 326967 N 4679811 (NAD 1983)				
Number of Employees		74				
NPRI ID		191				
Parent Company (PC) Information						
PC Name & Address		Centerline (Windsor) Limited		415 Morton Drive Windsor, ON N9J 3T8		
Primary North American Industrial Classification System Code (NAICS)						
2 Digit NAICS Code	NAICS 2 Code: 33 - Manufacturing					
4 Digit NAICS Code	NAICS 4 Code: 3335 – Metalworking Machinery Manufacturing					
6 Digit NAICS Code	NAICS 6 Code: 333511 – Industrial Mould Manufacturing			ing		
Facility and Planner Contact Information						
Facility Public and Technical Contact	Jan Cizmanski		Centerline (Windsor) Limited			
	Email: jan.cizmanski@cntrline.com		415 Morton Drive Windsor, ON N9J 3T8			
	Phone: (519) 734-8464 x 4469					
Planner Responsible for Making Recommendations and Certification	Mark Vanderheyden		RWDI AIR Inc.			
	Planner Licence No.: TSRP0241		- 650 Woodlawn Road West Guelph, Ontario - N1K 1B8			
	Email: Mark.Vanderheyden@rwdi.com					
	Phone: (519) 823-1311					





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COPPER (AND ITS COMPOUNDS) (CAS NO.)**

Statement of Intent

Centerline (Windsor) Limited is committed to preserving the environment through minimizing its impact in any negative aspect, while complying with all legislative requirements. We remain ISO14001:2004 compliant company through internal enforcement of company EMS policies. Our continual efforts in this regard are being tracked through rigorous CI (Continuous Improvement) process, which is monitored and evaluated on monthly basis. We have launched number of CI initiatives that are helping us in being compliant with the TRA legislation. However, due to certain monitoring cost restriction we are not committing to predetermined targets for copper usage/processing reduction

Objectives

The facility does not intend to reduce the use of Copper. Copper is an alloy within the metal used to make the main products at the facility and can not be removed or altered without significantly risking product specifications. If a reduction option(s) aligns with continuous improvement objectives, business initiatives and product line alterations, Centerline will consider implementing the reduction option through continuous improvements as directed by their Environmental Management Systems and Corporate initiatives.

Description of Used Substance

Copper is an alloy within the metal used to make the main product at the facility

Rationale for No Option(s) to be Implemented

In accordance with s. 4(1)6 of the Toxic Reduction Act, the facility does not intend to implement any options at this time through this legislation. The Facility has completed a detailed technical and in some cases an economical review of all proposed options within the 7 categories and as a result of this in-depth evaluation is choosing not to implement any options. The Facility will continue to investigate process efficiencies and continuous improvement efforts through ISO 14001 EMS objectives, business initiatives and products requirements as it has done continually throughout the years, in an effort to reduce toxic substances where feasible.

This plan summary accurately reflects the Toxic Reduction Plan that has been prepared by RWDI AIR Inc. and Centerline (Windsor) Ltd. Electrode Division for Copper (and its compounds), dated December 20, 2012.

(WINDSOR) LIMITED

www.cntrline.com

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Certification by Highest Ranking Employee

As of December 20, 2012, I, Michael Beneteau, certify 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 comply with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

Substance Date of Certified Plan

■ Copper (and its compound (CAS No. **) December 20, 2012

Original Signed Copy is Retained On-Site

Michael Beneteau CEO Centerline (Windsor) Limited www.cntrline.com

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Certification by Licenced Planner

As of December 20, 2012, I, Mark Vanderheyden, certify that I am familiar with the processes at Centerline (Windsor) Limited 595 Morton Drive (Electrode Division), Windsor, Ontario 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 toxic substance reduction plans referred to below for the toxic substances and that the plans comply with the Act and Ontario Regulation 455/09 (General) made under that Act.

<u>Substance</u>	Date of Certified Plan
■ Copper (and its compounds (CAS No. **)	December 20, 2012

Original Signed Copy is Retained On-Site

Mark Vanderheyden, Planner Licence # TSRP0241 Project Director / Toxic Substance Reduction Planner RWDI AIR Inc.