TRA PLAN SUMMARY – XYLENE

BASIC FACILITY INFORMATION

Name & CAS # of Substance	Xylene	1330-20-7
Substance for which other Plans have been prepared	Toluene	108-88-3
Facility Identification and Site Address		
Company Name	Blue Giant Equipment Corporation	
Facility Name	Blue Giant	
Facility Address	85 Heart Lake Road South Brampton, ON L6W 3K2	
Spatial Coordination of Facility	602038m Easterly 4839361m Northerly	
Number of Employees	187	
NPRI ID	7137	
Parent Company (PC) Information		
PC Name & Address **Percent Ownership for each PC**	Blue Giant Equipment Corporation (100% owned)	
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	336990 - Other Transportation Equipment Manufacturing	
Company Contact Information		
Facility Public/Technical Contact	Mr. Michael Hayes – Vice President of Operations	
	MHayes@bluegiant.com	
	Phone: (905)-457-3900 ext 245	
	Fax: (905)-457-2350	
Person who Prepared the Plan: **(if different from the Coordinator)**	Kaitlin Raheb, P.Eng	
	Conestoga-Rovers & Associates Limited 651 Colby Drive, Waterloo ON N2V 1C2	
	kraheb@craworld.com	
	Phone: (519) 884-0510	
Highest Ranking Employee	Mr. Michael Hayes – Vice President of Operations	
	MHayes@bluegiant.com	
	Phone: (905)-457-3900 ext 245	
	Fax: (905)-457-2350	

Planner Information:	
Planner Responsible for Making Recommendations	Kaitlin Raheb, P.Eng
	Conestoga-Rovers & Associates Limited 651 Colby Drive, Waterloo ON N2V 1C2
	Planner License No: TSRP0009
	kraheb@craworld.com
	Phone: (519) 884-0510
Planner Responsible for Certification	Kaitlin Raheb, P.Eng (Licence TSRP0009)
	kraheb@craworld.com
	Phone: (519) 884-0510
	Fax: (519) 884-0510

TOXIC REDUCTION POLICY STATEMENT OF INTENT

Blue Giant Equipment Corporation (Blue Giant) Brampton facility (Facility) uses xylene in two processes. The Facility does not intend to reduce the use of this toxic substance at the Facility.

REDUCTION OBJECTIVES

Blue Giant produces high quality products in an environmentally responsible manner. Blue Giant's manufacturing operation has been optimized to minimize the use of raw materials. Blue Giant will strive to reduce the use of xylene at the Facility in the future should an option become available.

DESCRIPTION OF FACILITY

Blue Giant produces elevated loading docks. The main manufacturing process consists of cutting, welding and painting metal to produce a variety of loading docks.

The North American Industry Classification System (NAICS) Code that applies to this Facility is 333920 – Material Handling Equipment Manufacturing.

In 2014, the Facility operated their manufacturing process from 6:00 a.m. to 2:30 p.m., 6 days a week, up to 52 weeks per year.

TOXIC SUBSTANCE REDUCTION OPTIONS

After looking into the seven categories of toxic substance reduction options, no options were identified. Explanations are provided in the table below to detail why an option could not be identified in each category.

Toxic Substance Reduction Category	Option: Identification and Description
1) Materials or feedstock substitution	**No option identified:** The Facility has considered switching their current paint to water-based, high solids paint or powder coatings; however, it was identified that these materials would either require the product to be cleaned before application and/or require a much longer curing time with a heating section. The Facility requires a fast curing paint as part of their current manufacturing process and due to critical building size limitations; therefore a switch to an alternative paint is not a viable option at this time. Alternative coating materials will be revaluated in the next 2-5 years, when the Facility plans to expand their operations and move to a larger facility. The Facility plans to continue to increase their dock leveler and elevating dock production operations by 15 percent each over the next few years. As a result, the Facility expects to increase the volume of paint used, and therefore increase the amount of xylene used and released to air.
2) Product design or reformulation	**No option identified:** Blue Giant's business is based on customer contracts and in meeting market competition. This includes meeting competitive architectural and engineering specifications regarding the product design, longevity of the product and raw material used. A change to the product design or reformulation is not possible under the existing customer contracts or competitive conditions.
3) Equipment or Process Modification	**No option identified:** The Facility equipment and manufacturing processes are currently optimized to produce final products that meet client specifications. Replacing the existing paint products used with high solids or water-based paint products or powder coatings (as mentioned in Category 1) would have a ripple effect on the Facility's equipment and processes, requiring the installation of wash stations, filtration, and curing stations. The Facility does not currently have the space for these additional pieces of equipment. There are currently no modifications available to be made to the equipment/process that use xylene that would result in a reduction in its use.

4) Spill and Leak prevention	**No option identified:** Blue Giant has a documented procedure on how to handle a spill or leak of paint and has implemented spill containment units to reduce the potential for leaks. Procedures are posted on the floor in designated locations and are communicated to the team through training. The Facility also indicated no spills have occurred in 2013, or since.
5) On-site reuse or recycling	**No option identified:** The paint spray booths are equipped with a cleaning system that uses solvents to clean out their spray equipment when a change in paint is required. The excess paint and cleaning solvent is sent off-site for solvent recovery or disposal. The Facility may purchase recycled solvent back from the off-site facility and use it in their operation, however, this is not considered a reduction option per the terms of the MOE TRA due to the recycling occurring off-site. It is Blue Giant's opinion that the use of recycled solvent from an off-site source should be considered when implementing toxic reduction plans.
6) Improve inventory management or purchasing techniques	**No option identified:** Blue Giant uses a database management system to track quantities of products being received on-site and production demands. Therefore no surplus storage exists at the Facility. The Facility is unable to identify a reduction option related to improved inventory management or purchasing techniques, as they are already doing everything possible in this category.
7) Training or improved operating practices	**No option identified:** Blue Giant currently has standard operating procedures and practices in place at the Facility. All employees are trained on the facility procedures and practices, as well as on the efficient use of process equipment. Operating practices and training procedures are reviewed and updated as necessary and area for improvement will continue to be evaluated on a regular basis. Therefore, no options have been identified for the category at this time.

PLAN SUMMARY STATEMENT

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

CERTIFICATION BY HIGHEST RANKING EMPLOYEE

Attached.

CERTIFICATION BY LICENSED PLANNER

Attached.

Section 2.0 Plan Certifications

Certification by Highest Ranking Employee

As of December 18, 2014, I, Michael Hayes 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.

Toluene
Xylene

Michael Hayes
Vice President of Operations
Blue Giant Equipment Corporation

Certification by Licensed Planner

As of December 18, 2014, I, Kaitlin Raheb, certify that I am familiar with the processes at Blue Giant that use 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 2014 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Toluene
Xylene

KRaheb

Kaitlin Raheb, P. Eng
Licensed Toxic Reduction Planner, License # TSRP0009
Conestoga-Rovers & Associates Limited