

TRA PLAN SUMMARY - NICKEL

BASIC FACILITY INFORMATION

Name & CAS # of Substance	Nickel	7440-02-0
Facility Identification and Site Address		
Company Name	Bend-All Automotive Inc.	
Facility Name	Bend-All	
Facility Address	575 & 655 Waydom Drive, Ayr, Ontario N0B 1E0	
Spatial Coordination of Facility	(UTM Easting, UTM Northing) 545783, 4798543	
Number of Employees	695	
NPRI ID	05993	
Ontario MOE ID Number	8289	
Parent Company (PC) Information		
PC Name & Address	Bend-All Automotive Inc. Located at 575 & 655 Waydom Drive in Ayr, Ontario	
Percent Ownership for each PC	(100% owned)	
Business Number for PC	122615503	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	33 - Manufacturing	
4 Digit NAICS Code	3329 - Other Fabricated Metal Product Manufacturing	
6 Digit NAICS Code	332999 - All Other Miscellaneous Fabricated Metal Product Mfg.	
Company Contact Information		
Facility Public Contact	Gord Rowe, Manager	
	gord.rowe@bend-all.com	
	Phone: (519) 623-2002 ext. 227	
	Fax: (519) 623-1489	

Facility Technical Contact:	Gord Rowe, Manager
	gord.rowe@bend-all.com
	Phone: (519) 623-2002 ext. 227
	Fax: (519) 623-1489
Company Coordinator Contact	Gord Rowe, Manager
	gord.rowe@bend-all.com
	Phone: (519) 623-2002 ext. 227
	Fax: (519) 623-1489
Person who Prepared the Plan: (if different from the Coordinator)	Erik Martinez, P.Eng
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	emartinez@croworld.com
	Phone: (519) 884-0510
	Fax: (519) 884-0525
Highest Ranking Employee	Alfred Napolitano, CEO
	Alfred.Napolitano@bend-all.com
	Phone: (519) 623-2002
	Fax: (519) 623-1489
Planner Information:	
Planner Responsible for Making Recommendations	Erik Martinez, P.Eng
	Planner License No: TSRP0005
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Planner Responsible for Certification	Erik Martinez, P.Eng
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	Phone: (519) 884-0510
	Fax: (519) 884-0525

TOXIC REDUCTION POLICY STATEMENT OF INTENT

Bend-All is currently using nickel in six processes. The Facility does not intend to reduce the use of these toxic substances. Bend-All does not create nickel, therefore, this plan will not address reducing the creation of these substances.

REDUCTION OBJECTIVES

Bend-All prides itself on technological innovation in order to manufacture automotive components for a variety of customers in an environmentally responsible manner. Bend-All will strive to eliminate the use of the metal nickel 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 FACILITY

Bend-All fabricates metal products for the automotive industry. The final manufactured products are automotive components, in particular power steering lines, coolant lines and vehicle seat frames. The Facilities activities include cutting and deburring the steel material, forming/bending, and assembly of the automotive parts prior to packaging for shipment. The raw materials used at the Facility include steel, aluminum and bulk wire which contain the compounds nickel as a constituent material.

The North American Industry Classification System (NAICS) Code that applies to this Facility is 332999 - All Other Miscellaneous Fabricated Metal Product Manufacturing.

TOXIC SUBSTANCE REDUCTION OPTIONS TO BE IMPLEMENTED

There were no options identified that can be implemented by Bend-All to reduce the use, creation, or release of nickel.

PLAN SUMMARY STATEMENT

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

CERTIFICATION BY HIGHEST RANKING EMPLOYEE

Attached.

CERTIFICATION BY LICENSED PLANNER


Attached.

8.0 PLAN CERTIFICATIONS

CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of December 19, 2012, I, Alfred Napolitano, 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.

Chromium
Manganese
Nickel



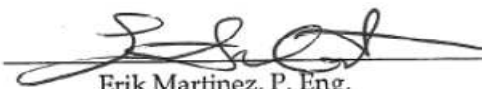
Alfred Napolitano
CEO
Bend-All Automotive Inc.

DECEMBER 19, 2012
Date

CERTIFICATION BY LICENSED PLANNER

As of December 19, 2012, I, Erik Martinez, certify that I am familiar with the processes at Bend-All Automotive Inc. that use or create the toxic substance 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 19, 2012 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

Chromium
Manganese
Nickel



Erik Martinez, P. Eng.
Planner License # TSRP0005
Conestoga-Rovers & Associates Ltd.

Dec 20, 2012
Date