



Public Reporting Under O. Reg. 455/09
Public Plan Summary

CpK Interior Products Inc.
Port Hope Plant

November 29, 2013

ENVIRONMENTAL REPORTING:

The National Pollution Release Inventory (NPRI) is Canada's legislated, publically accessible inventory of releases (to air, water and land), disposals and transfers for recycling that are associated with industrial activity. Over 84,000 facilities report to the NPRI on more than 300 listed substances. CpK Interior Products Inc. has been reporting in accordance with federal NPRI regulations since 1994.

Additionally, beginning in 2010, the Toxics Reduction Act requires certain facilities in Ontario to prepare and publish toxic substance reduction plans, though implementation of the plans is voluntary. The first report under the Toxic Reduction Act and Ontario Regulation 455/09 was required in June 2011.

Regulation 455 requires facilities to report on their use and creation of certain "substances of concern". Currently the list of substances of concern under the Toxics Reduction Act includes all of the substances on the NPRI list. Therefore, in addition to reporting releases, disposals and transfers of substances listed under NPRI, Ontario facilities must report on their use and creation of these substances along with the amount of the substance contained in each product.

Vehicles and vehicle components are made by all manufacturers in a similar manner globally. All vehicles sold in Canada must meet the same consumer performance expectations for the Canadian market as for export markets where they are sold. To meet these expectations, many of the substances listed in Ontario Regulation 455/09 as "substances of concern" are utilized in the manufacture of all vehicles, including those assembled elsewhere and imported to Ontario for sale.

BASIC FACILITY INFORMATION

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Substances Included in the Plan		
<ul style="list-style-type: none"> ▪ Particulate Matter PM2.5 (CAS No. NA-M10) ▪ Polymeric diphenylmethane diisocyanate (CAS No. 9016-87-9) 		
Facility Identification and Site Address		
Company Name	CpK Interior products	
Facility Name	Port Hope Operations	
Facility Address	Physical Address:	Mailing Address:
	128 Peter Street Port Hope, ON L1A 3W4	Same as physical address
Spatial Coordinates of Facility	4869980 (Northing) 718179 (Easting) (UTM 17)	
Number of Employees	426	
NPRI ID	571	
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	33 (Manufacturing)	
4 Digit NAICS Code	3363 (Motor vehicle parts manufacturing)	
6 Digit NAICS Code	336360 (Motor vehicle seating and interior trim manufacturing)	
Facility and Planner Contact Information		
Facility Public Contact	Sue Forest	Chrysler Canada Inc.
	Email: sf3@chrysler.com	3939 Rhodes Drive CIMS 242-01-03
	Phone: (519) 973-2864	Windsor, On N9A 4H6



EXISTING ENVIRONMENTAL MANAGEMENT SYSTEMS

CpK Interior Products Inc. (a subsidiary of Chrysler Canada Inc.) is committed to the responsible management of all of its facilities and operations. This includes a proactive approach towards protecting public health and the natural environment through existing and planned environmental and sustainability initiatives. All Canadian operations have implemented comprehensive environmental management systems including Pollution Prevention commitments through World Class Manufacturing (WCM) and ISO 14001 certified Environmental Management Systems. Through these initiatives, each CpK facility intends to reduce or minimize its use and/or creation of each listed substance wherever possible. More specifically, the CpK Interior Products Port Hope facility is dedicated to reducing its use and creation of toxic substances by continually striving for operational and process efficiency, innovation, and conservation.

In fact, Chrysler Group LLC as a whole has adopted a global approach such that each facility has defined a standard process-based Environment Management System that identifies a process for continuous improvement, ongoing measurement of metrics tracked through scorecards and use of objective statements. The key to the success of the ISO 14001 is that metrics are reviewed by a third party accredited body to ensure that the Environment Management Systems strive for continuous improvement, meet or exceed regulatory standards and document all activities in accordance with the procedures outlined in the system. These practices have been adapted by all CpK Interior Products facilities

As an example of the continuous improvement efforts that have been implemented within the plant, the following graph outlines the trend of $PM_{2.5}$ created in kilograms report to NPRI per car set produced for the past 3 years (Figure 1). The trend shows data from 2010 to 2013 and highlights (on a per unit production basis) that CpK has already reduced the creation of $PM_{2.5}$ by 31% over the past 3 years.

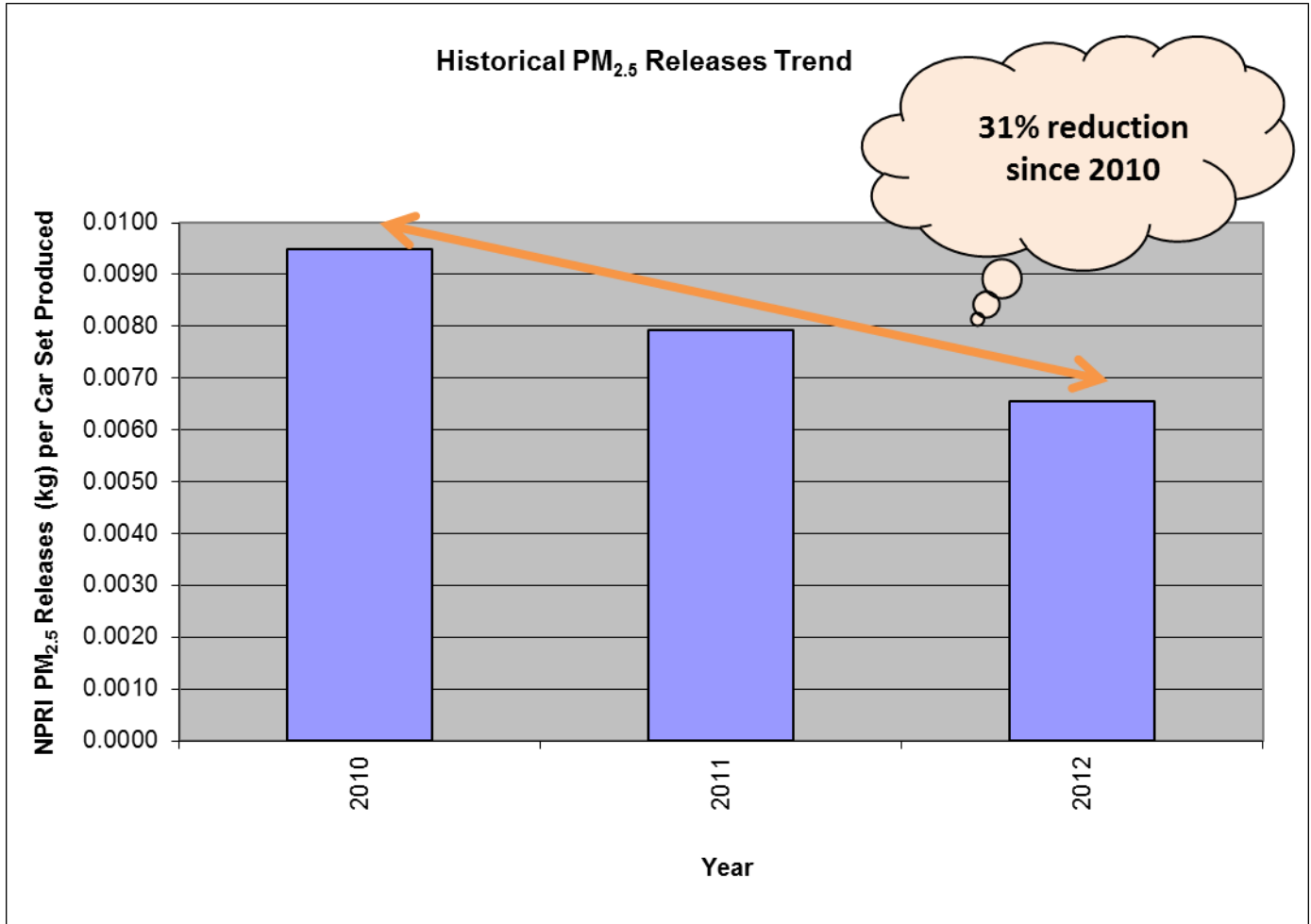


Figure 1: Historical PM_{2.5} Trends

PLAN SUMMARY FOR EACH SUBSTANCE

PM_{2.5} (CAS NO. NA – M10)
Statement of Intent
In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Policies, CpK intends to reduce or minimize the use of the listed substance wherever possible.
Objectives
CpK Interior Products Inc. Port Hope does not intend to implement a reduction option for PM _{2.5} . CpK will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements in an effort to reduce the creation of PM _{2.5} in the future.
Description of Creation of Substance
The majority of PM _{2.5} is created through combustion equipment. A small portion is created through the fabrication of MODs.
Rationale for No Option(s) to be Implemented
In accordance with s. 4(1)6 of the Toxic Reduction Act, CpK Port Hope has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation is choosing not to implement any of the options under the Ontario Toxic Reduction Act. CpK will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product 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 CpK Interior Products Inc Port Hope Facility for PM_{2.5}, dated November 29, 2013.

PMDI (CAS NO. 9016-87-9)	
Statement of Intent	
In accordance with s. 4(1)1 of the Toxics Reduction Act and the Facility commitment to pollution prevention through World Class Manufacturing initiatives, ISO 14001 certified Environmental Management Systems and Corporate Policies, CpK intends to reduce or minimize the use of the listed substance wherever possible.	
Objectives	
CpK Interior Products Inc. Port Hope does not intend to implement a reduction option for PMDI. CpK will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product requirements in an effort to reduce the use of PMDI in the future.	
Description of Use of Substance	
All of the PMDI is used in the foam process to make various interior vehicle components. PMDI and Polyol is then injected simultaneously into the mould and through a chemical reaction creates the foam.	
Rationale for No Option(s) to be Implemented	
In accordance with s. 4(1)6 of the Toxic Reduction Act, CpK Port Hope has completed a detailed technical, and in some cases an economical, review of all proposed options within the seven mandatory categories and as a result of this in-depth evaluation is choosing not to implement any of the options under the Ontario Toxic Reduction Act. CpK will continue to investigate process efficiencies and continuous improvement efforts through World Class Manufacturing initiatives, ISO 14001 EMS objectives, business initiatives and product 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 CpK Interior Products Inc. Port Hope Facility for PMDI, dated November 29, 2013.



Certification by Highest Ranking Employee

As of November 29, 2013, I, Alfredo Fernandez, 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.

<u>Substance</u>	<u>Date of Certified Plan</u>
▪ Polymeric diphenylmethane diisocyanate (CAS No. 9016-87-9)....	November 29, 2013
▪ Particulate Matter PM _{2.5} (CAS No. NA-M10).....	November 29, 2013

/s/ Alfredo Fernandez

Alfredo Fernandez
Acting Plant Manager
Chrysler Canada Inc.
CpK Interior Products Inc.
Port Hope Operations



Certification by Licensed Planner

As of November 29, 2013, I, Mark Vanderheyden, certify that I am familiar with the processes at CpK Interior Products Inc. Port Hope Plant 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>	<u>Date of Certified Plan</u>
▪ Polymeric diphenylmethane diisocyanate (CAS No. 9016-87-9)....	November 29, 2013
▪ Particulate Matter PM _{2.5} (CAS No. NA-M10).....	November 29, 2013

/s/ Mark Vanderheyden

Mark Vanderheyden, Planner License #0241
Project Director / Toxic Substance Reduction Planner
RWDI AIR Inc.