



Toxic Substance Reduction Plan Summary

for

Zinc (CAS# n/a)

December 7, 2012

Mitchell NVH

Cooper Standard Automotive Canada Ltd.

80 Arthur Street

Mitchell, Ontario

N0K 1N0

BASIC FACILITY INFORMATION

Name & CAS# of Substance: **Zinc, CAs# n/a**

Other Phase I substances for which plans have been prepared:

Xylene (CAS# 1330-20-7)
Ethylbenzene (CAS#100-41-4)
Toluene (CAS# 108-88-3)

Facility Identification and Site Address:

Company Name: Cooper Standard Automotive Canada Limited
Facility Name: Cooper Standard Automotive – Mitchell NVH
Physical address: 80 Arthur Street, Mitchell, ON, N0K 1N0
Mailing address: 80 Arthur Street, Mitchell, ON, N0K 1N0
Spatial coordinates of the facility: Easting: 484538, Northing: 4812092, UTM Zone: 17
Datum: NAD83

Number of full time employees: 200

NPRI ID: 4411
Business Number: 104987714

Primary NAICS Code:
- Two digit NAICS code: 32
- Four digit NAICS code: 3262
- Six digit NAICS code: 326290 (Other Rubber Product Manufacturing)

Parent Company:

Cooper-Standard Automotive Inc.
39550 Orchard Hill Place
Novi, MI 48375, USA
Percent Ownership: 100%

Facility Public Contact:

Name: Glenn Geurten
Title: Plant Manager, Mitchell NVH
Address: 80 Arthur Street, Mitchell, ON, N0K 1N0
Phone Number: (519) 348-6000
E-mail: GGeurten@cooperstandard.com

Parent Company Public Contact:

Name: Sharon Wenzl
Title: Vice-President, Corporate Communications
Address: 39550 Orchard Hill Place. Novi, MI 48375, USA
Phone Number: 248-596-6211
E-mail: sswenzl@cooperstandard.com

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for zinc, prepared by Cooper Standard Automotive – Mitchell NVH plant and dated December 7, 2012.

Statement of Intent

Cooper Standard – Mitchell NVH is committed to conducting its business in a manner, which results in the lowest possible impact on the environment. We recognize that zinc, which is present in the rubber processed by our facility, is an environmental contaminant and will strive to minimize its use and releases to the environment.

Cooper Standard – Mitchell NVH plant does not create zinc. Accordingly, the facility has no plans to reduce the creation of zinc.

Objectives

Cooper Standard will make it an ongoing effort to minimize the zinc use and disposals from the Mitchell NVH facility. While zinc is an essential component of our products and therefore cannot be eliminated, reducing the amounts of the production scrap generated represents the best opportunity for zinc use reduction at the facility. Therefore, we will attempt to minimize the waste generation as much as practically possible. Where waste is unavoidable, we will strive to find recycling opportunities and minimize the landfilling requirements.

Description of Substance

Zinc is present in the rubber processed by the facility. It is a necessary ingredient of rubber.

Toxic Substance Reduction Options to be Implemented

The following options have been identified for implementation to reduce the use and emissions of zinc:

➤ **Self-Directed Work Teams**

The Self Directed Work Team concept involves a major restructuring of the responsibilities for the production process in the molding and assembly areas. It involves creation of small work teams, assigning these teams to specific plant areas and product groups and a reduction of the employee rotation throughout the production areas. These changes are expected to result in better employee knowledge of the product being manufactured, more direct involvement in ensuring product quality and reduced amount of rubber being scrapped due to quality defects.

Estimated Zinc Reductions Due to Implementation of the Reduction Options

Reduction Option: **Self-Directed Work teams**
Substance: **Zinc**

	Used (tonnes/yr)	Created (tonnes/yr)	Contained in Product (tonnes/yr)	On-Site Releases (tonnes/yr)			Disposals (tonnes/yr)		Off-Site Recycling (tonnes/yr)
				Air	Water	Land	On-Site	Off-Site	
CY 2011 (Baseline)	62.43	0.00	53.11	0.00	0.00	0.00	0.00	4.92	4.40
Reduction	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.020	0.020
% Reduction	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.5%
Reduced Total	62.39	0.00	53.11	0.00	0.00	0.00	0.00	4.90	4.38

Estimated completion: 2013

9 PLAN CERTIFICATION - ZINC

Certification by the Highest Ranking Employee

As of December 10, 2012, I, Glen Geurten, 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.

Zinc, CAS# n/a




Glenn Geurten
Plant Manager – Mitchell NVH
Cooper Standard Automotive Canada Limited

Certification by Licensed Planner

As of December 10, 2012, I, Michael Labocha, certify that I am familiar with the processes at the Cooper Standard Automotive – Mitchell NVH plant, 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 the subsection 4 (1) of the Toxics Reduction Act, 2009 that are set out in the plan dated November 19, 2012 and that the plan complies with the Act and Ontario regulation 455/09 (General) made under that Act.

Zinc, CAS# n/a



Michael Labocha (Planner License# TSRP0038)
Senior Environmental Engineer
Cooper Standard Automotive Canada Limited