

2015-2016 Annual Green Tier 1 Report

**The Toro Company
200 Sime Avenue
Tomah, WI 54660**

Background:

The Toro Company – Tomah, Wisconsin facility received formal approval into the Wisconsin DNR Green Tier 1 program on June 29, 2012. The Toro Company in Tomah, WI manufactures both landscape contractor and commercial turf care products and service parts. The facility currently employs over 600 people at a 300,000 square foot facility.

Environmental Management System (EMS)

The Toro Company passed ISO 14000:2004 environmental surveillance audit on June 2, 2015 through LRQA (Lloyd's Register Quality Assurance, Inc.). Toro will be completing its recertification to this standard in September 2016. Compliance to ISO 14001:2015 is planned for September 2017.

Environmental Compliance:

External auditor's complete environmental compliance audits of Toro-Tomah every three years. The next scheduled compliance audit November 2017.

Environmental Targets and Objectives:

1) Improve Waste Management (in lbs)

- a. Continue recycling for aluminum cans and plastics. Continue to reduce material being sent to landfill.**

Year	Wood	Cardboard	Metal	Landfill
F16 YTD	1,012,000	392,000	246,940	55,380
F15 YTD	1,659,000	533,450	501,180	204,680
F14 (Actual)	1,744,000	460,900*	632,000	220,260
F13 (Actual)	1,664,000	704,700	498,160	172,500
F12 (Actual)	1,728,000	939,000	405,160	230,000
F11 (Actual)	1,552,000	783,000	600,460	368,000
F10 (Actual)	1,216,000	665,000	457,520	494,500

***Changed to returnable packaging**

The Toro Company Tomah, Wisconsin plant is met its goals relating to recycling during F15. We are currently on track for F16.

b. Visit, tour, and audit one transporter and/or disposal facility of hazardous waste annually.

Completed audit of Hydrite Chemical in LaCrosse, WI on 9/3/15. We did not identify any nonconformance's during our audit.

c. Track hazardous waste to determine the effectiveness of the installation of new paint proportioning equipment.

2014 Hazardous Waste Generation: 20175#

2015 Hazardous Waste Generation: 13150#

Toro-Tomah Wisconsin has seen a 35% reduction in the generation of hazardous waste. This is attributable to installation and operation of new painting equipment.

2) Improve Chemical Management

a. Investigate paint finishing options to replace current technologies with equipment, chemicals, and paints posing a lesser concern onto the environment. Owner: Tom Nordwig Target Completion Date: 1/1/16

b. Determine feasibility of options meeting Toro's coatings criteria.

1. Currently evaluating Ecoat prime + powder topcoat. These options provide excellent performance qualities along with significant reductions in VOC and hazardous waste vs current liquid spraying processes. Owner: Tom Nordwig Target Completion Date: 1/1/16

c. Determine cost factors to incorporate changes.

1. Initial budgets indicate capital equipment expenses over \$26 M. Owner: Tom Nordwig Target Completion Date: 1/1/16

3) Improve Environmental Management

a. Assure all MSDSs are converted to electronic versions using MSDS Online and continue reduction of inventory for unused items stored in the paint vault and departments. Owner: Paul Rasmussen and Tom Nordwig. Target Completion Date: Ongoing

b. Assure transition from MSDS to SDS. Owner: Paul Rasmussen Target Completion Date: 6/1/15 Follow Up: Ongoing

c. Finalize air permit renewal. Air permit is now in its public comment period awaiting final approval.

d. Implementation of air construction permit to implement replacement of a paint finishing system within the plant. Construction permit is in

the process of being developed. Will be submitted to WDNR by July 2017.

Target Completion Date: 12/1/16

e. Provide refresher training in the following areas; Owner: Tom

Nordwig Target Completion Date: Ongoing

- 1. RCRA – Associates involved with handling hazardous waste.**
- 2. DOT Hazardous Waste – Associates involved with transporting hazardous waste.**
- 3. Universal Waste – General Plant.**
- 4. Drums / Totes: Storage and Disposal – General Plant**
- 5. Spills and clean up – General Plant**
- 6. Solid waste recycling – General Plant**
- 7. Environmental Aspect Training – General Plant**

All training is current and up to date.

Executive Summary:

From advanced work in electric, biofuel, and propane technologies to our many water-saving irrigation products, we are committed to protecting the world's critical resources and delivering commercially viable solutions that yield environmental, performance, and productivity innovation to our customers.

Equally important are our ongoing efforts to create a leaner, more efficient operational footprint. Across all worldwide manufacturing facilities, we recycle steel, aluminum, plastics and cardboard packaging. To reduce wood packaging waste, we ship many of our professional products as drive-on products and receive many of our product components from suppliers in reusable packaging. We recycle water and reuse paint within our paint systems. We also continue to invest in more advanced technologies that allow us to reduce our energy usage and improve productivity.

Environmental Performance:

1. Toro has passed the second surveillance audit within current certification for ISO 14001 on 6/2/2016
2. Toro is continuing the replacement of florescent lights to LED lights within the plant resulting in less energy usage. All high bay and task florescent lights is planned for replacement by 10/31/16.
3. Tomah Toro Manufacturing Plant has not received any notices of non-compliance from any regulatory agency in the last year.
 - a. Mobil Air Conditioning recertification to state is up to date.
 - b. 2015 Tier II submission 1/25/16 completed for 200 Sime Avenue location.

- c. 2015 Hazardous Waste Inventory submission 1/22/16.
- d. 2014 Air Emission Inventory (TRI): Completed
- e. EPCRA report for Distribution Center: Completed.
- f. 2016 Semi-Annual Pretreatment Sampling – Complete for 1st half 2016
- g. Wastewater sampling equipment inspection complete April 2016.

FY 2016 ISO 14001 Targets and Objectives

Toro Tomah Manufacturing Plant

1) Improve Waste Management

- a. Continue recycling for aluminum cans and plastics. Continue to reduce material being sent to landfill from .509#/standard hour to .494#/standard hour. Owner: Tom Nordwig. Target 10/31/15

F15 Actual landfill rate: 509#/Std Hour (204,680 #/402067 Hrs)

Results of recycling effort:

Year	Wood	Cardboard	Metal	Landfill
F16 (YTD)	1,012,000	392,000	246,940	55,380
F15 (Actual)	1,659,000	533,450	501,180	204,680
F14 (Actual)	1,744,000	460,900	632,000	220,260
F13 (Actual)	1,664,000	704,700	498,160	172,500
F12 (Actual)	1,728,000	939,000	405,160	230,000
F11 (Actual)	1,552,000	783,000	600,460	368,000
F10 (Actual)	1,216,000	665,000	457,520	494,500

- b. Visit, tour, and audit one transporter and/or disposal facility of hazardous waste annually. Owner: Tom Nordwig. Target Completion Date: 10/31/16
- c. Reduce universal waste and reduce energy usage replacement of florescent light bulbs and ballasts with LED lighting throughout plant. Owner: Tom Nordwig. Target Completion Date: 10/31/16
- Reduction in plant energy costs
 - Reduction in universal wastes of florescent light bulbs and ballasts
 - Reduced maintenance repair costs
- d. Re-source sheet plastic materials. Owner: Tom Nordwig. Target Completion: 1/31/16. Previous recycling company went out of business.
-Sheet plastic materials sourced with Quincy Recycle on 1/15/16
-Update: Quincy will not accept our material due to inconsistency of material quality received.
- e. Investigate and evaluate alternate wastewater chemistry to reduce phosphorus levels in wastewater along with reducing waste sludge hauled off-site. Target Completion Date: 10/31/16
-Six Sigma study currently under investigation.

Significant Aspect(s) and/or Legal & Other Requirements considered:

1. Recycled material evaluation score=4 with a moderate potential to impact the environment. Tomah Toro Manufacturing Plant currently recycles paper, cardboard, and paper waste. Documented procedures are in process for aluminum cans, and plastics.
2. Solid waste material evaluation score= 24
3. Regulated waste evaluation score= 448

2) Improve Chemical Management

FY 2016 ISO 14001 Targets and Objectives Toro Tomah Manufacturing Plant

- a. Investigate paint finishing options to replace current technologies with equipment, chemicals, and paints posing a lesser concern onto the environment. Owner: Tom Nordwig Target Completion Date: 10/31/16
- b. Determine feasibility of options meeting Toro's coatings criteria.
 - 1. Evaluating (2) color Ecoat option and Ecoat prime + powder topcoat options to replace current technology.
- c. Determine cost factors to incorporate changes.
 - 1. Process continues under review with Tomah staff and corporate senior staff members. 12/31/16 Owner: Tom Nordwig

Significant Aspect(s) and/or Legal & Other Requirements considered:

Process Material and Related evaluation score= 336 (significant)

Facility Maintenance and Land Management evaluation score=320 (significant)

Regulated Waste- evaluation score= 140 (significant)

Clean-up Materials- evaluation score=80 (significant)

3) **Improve Environmental Management**

- a. Assure all SDSs are converted to electronic versions using MSDS Online and continue reduction of inventory for unused items stored in the paint vault and departments. Owner: Health and Safety Coordinator and Tom Nordwig. Target Completion Date: Ongoing
- b. Participate in Miles Paractus Monroe County LEPC exercise to provide a better understanding of handling a natural emergency as it relates to EHS. Owner: Tom Nordwig and Paul Rasmussen Completion Date: 6/6/16
- c. Investigate need to modify current regulatory permitting with inclusion of new product lines and capital equipment purchases. Owner: Tom Nordwig Target Date: Ongoing
 - 1. Initiate review for new air construction permit with changes to Tractor paint finishing system in the plant
 - 2. Draft permit for 2015 air permit renewal submitted to WDNR with comments and revisions on 4/18/15
 - a. Renewal includes 2nd run up stations on assembly lines, run up for line 16, and run up at DC for configure to ship along with associated additional documentation/recordkeeping
 - b. Includes stand by generator and required documentation/recordkeeping
 - 3. Wisconsin DNR is currently rewriting our existing air permit to include changes. 10/31/16
- d. Provide refresher training in the following areas; Owner: Tom Nordwig Target Completion Date: Ongoing
 - 1. RCRA – Associates involved with handling hazardous waste.
 - 2. DOT Hazardous Waste – Associates involved with transporting hazardous waste.

FY 2016 ISO 14001 Targets and Objectives Toro Tomah Manufacturing Plant

3. Universal Waste – General Plant.
4. Drums / Totes: Storage and Disposal – General Plant
5. Spills and clean up – General Plant
6. Solid waste recycling – General Plant
7. Environmental Aspect Training – General Plant

All training has been completed within required time-lines.

Significant Aspect(s)

All