

**Attachment 3 Uncontrolled Copy
Commercial Division Operating Procedure**

TORO Tomah

Environmental Scope

Procedure Number: 06-01-29

8-3-2011

The Toro Company in Tomah, WI manufacturers both landscape contractor and commercial turf care products and service parts. The facility employs over 550 people at a 300,000 square foot facility located on 20 acres of land. This facility's focus includes: welding, painting, and assembly.

Purpose:

The purpose of this process is to establish and maintain a formal and organized environmental management system, following ISO 14001 requirements. This system replaces the former environmental management system which was part of Toro's EHSMS (Environmental Health Safety Management System)

References:

ISO14001:2004 Environmental Management Systems
Toro EHMS

Application:

- A. This process is intended to provide continuous improvement of environmental performance at the plant, the scrupulous attention to details and following of policies and procedures in this manual are mandatory.
- B. An internationally recognized third-party, Lloyds Register, validates this process for ISO14001 certification.
LRQA North America Business Center
Lloyd's Register Quality
1401 Enclave Parkway, Suite 200
Houston, TX 77077 USA

**Attachment 3 Uncontrolled Copy
Commercial Division Operating Procedure**

TORO Tomah

Environmental Policy

Procedure Number: 06-01-30

8-3-2011

The Toro-Tomah Manufacturing Plant Environmental, Health, and Safety mission is to ensure continual improvement of a safe and healthy environment for all employees, contractors, visitors, and community. Our work practices protect the environment, and Toro resources, while complying with regulatory requirements and preventing pollution.

Note: For this policy Toro-Tomah Manufacturing Plant is defined as:

The Toro Company
200 Sime Avenue
Tomah, WI 54660



CERTIFICATE OF APPROVAL

This is to certify that the Environmental Management System of:

**The Toro Company
200 Sime Avenue
Tomah, Wisconsin 54660, USA**

has been approved by Lloyd's Register Quality Assurance to the following Environmental Management System Standard:

ISO 14001:2004

The Environmental Management System is applicable to:

The Manufacture of Landscape Contractor and Commercial Turf Care Products and Service Parts.

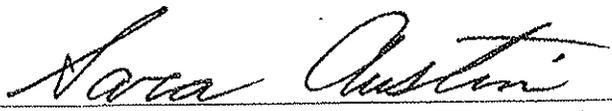
This certificate forms part of the approval identified by certificate number UQA 0107022

Approval
Certificate No: UQA 0107022/B

Original Approval: October 20, 2011

Current Certificate: October 20, 2011

Certificate Expiry: December 31, 2013


Issued by: Lloyd's Register Quality Assurance, Inc.



**FY 2012 ISO 14001 Targets and Objectives
Toro Tomah Manufacturing Plant**

1) Improve Waste Management

- a. Continue recycling for aluminum cans and plastics. Owner: Dave Betthausen. Target Completion Date: Implemented. Have found 40% reduction in material sent to landfill. Will continue to provide further improvements and reductions. Expected 10% improvement over current reduction. Target: 10/31/12

Results of recycling effort: 2011

- | | |
|--------------------|----------------------------|
| 1. March & April: | 45 T Garbage To Landfill |
| 2. May 1 | Started Recycling |
| 3. May & June | 26.4 T Garbage To Landfill |
| 4. Waste Reduction | 40% Reduction |

Other Plant Recycling Efforts:

	F09	F10
Wood	73 Loads	76 Loads
Cardboard	548,000 lbs	665,000 lbs

- b. Develop and implement a hazardous waste vendor audit procedure to audit waste haulers and disposal facilities. Owner: Tom Nordwig. Target Completion Date: Implemented. Ongoing follow up.
- c. Toro is not able to recycle Styrofoam materials through its recycling company. Eliminate/reduce the use of Styrofoam packaging materials with vendor supplied parts. Owner: Dave Betthausen. Target Completion Date: 10/31/12
- d. Evaluate single source disposal transporter for both hazardous and universal wastes. Owner: Tom Nordwig Target Completion Date: 10/31/12
- e. Develop calibration procedure of Toro's wastewater effluent sampling pump and effluent flow meter. Owner: Tom Nordwig Target Completion Date: 4/30/12

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. WI's to follow with training.
- 2. Solid waste material evaluation score= 24
- 3. Regulated waste evaluation score= 448

2) Improve Chemical Management

- a. Investigate use of water base paint booth material to replace current solvent base product to reduce air emissions and improve safety. Owner: Tom Nordwig Target Date: 10/31/12
- b. Standardize on a single source paint supplier to reduce number of hazardous materials within the plant, improve quality, and reduce waste. Owner: Tom Nordwig Target Date: 10/31/12
- c. Investigate the replacement of the Tractor area paint finishing system.
 - 1. Evaluate alternatives to chromium seal

**FY 2012 ISO 14001 Targets and Objectives
Toro Tomah Manufacturing Plant**

2. Evaluate reduction in emissions.
3. Evaluate improvements in fuel and electrical usage.

Owner: Tom Nordwig Target Date: 10/31/12

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 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: Spencer Stephens and Tom Nordwig. Target Completion Date: Ongoing
- b. Need to improve upon notification process of MSDS sheets as engineering and materials departments make changes to chemicals. Currently there is not a trigger which automatically notifies the Environmental Coordinator and Health and Safety department that new or changed materials require new MSDS. Owner: Rick Nicolaus. Target Completion Date: October 31, 2012.
- c. Apply and implement Wisconsin DNR Green Tier 1 environmental program. Owner: Tom Nordwig Target Date: 10/31/12
- d. Provide refresher training in the following areas;
 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 PlantOwner: Tom Nordwig Target Date: 10/31/12
- e. Review and update environmental database. Owner: Tom Nordwig Target Date: 10/31/12

Significant Aspect(s)

All