

# **FY 2015- 2016**

## **ISO 14001 Targets and Objectives**

### **Baldwin, WI**

- Linked to annual department line crawls.
- Addresses significant aspects that have a high or potential impact to the environment.
- Includes actions to reduce the impacts through upgrades, cost controls, or elimination of the aspect and addresses regulatory compliance.



# Improve Waste Management

## F'15

- a) Reviewing replacing current dumpsters with luggers and purchase more roll-off covers. This will lessen the impact of contaminated storm water from our outdoor dumpsters. Due to higher transportation costs using smaller luggers, we will continue with the current dumpsters and purchase an additional cover for two containers that do not get changed over as frequently. This will keep the stormwater from accumulating in the dumpsters and potentially leaking into the waterways.
  
- b) Continue our zero landfill plans. F15-Reviewing plastic bottles, aluminum cans, and office paper from Waste Management to Badger Recycling Sept. 2014 when WM contract expires. Donaldson will now get reimbursed for these recyclables and be able to track these wastes separately. Badger accepts all plastic types. WM Cost = \$4200 annually vs. Badger \$109 (F15 costs)

## F'16

- a) Review recycling supplier program- perform audit of current facility and define processes for disposition of wastes. Investigate what alternative vendors offer. (Ron- May 2016)
  
- b) Universal Wastes – Use alternative vendor (Nexeo) for better tracking and disposition of these wastes (Ron-Aug 2015).
  
- c) Review zero landfill program- look for additional landfill wastes that can be recycled (grinding discs, paper towel hand wipes, etc.)



# Improve Chemical Management

## F'15

a) Review recycled solvent and still in dept. 35- Feb 2015. Reclaiming our solvents is more cost effective and less wasteful. Currently Baldwin does not produce enough solvent waste to make a still cost effective. We use more reclaimed solvent than we produce with paint related waste.

CLOSED

b) Review eliminating MEK in paint departments - Feb. 2015. We currently purchase reclaimed solvents that contain 50% MEK. This is a more hazardous solvent. Nexeo to provide new e-solvent (NMP) in March 2015 for testing in both paint departments. Federally exempt solvent with higher flashpoint. Higher costs. Non-hazardous waste. Contacted Nexeo 5/4 and 6/19. Looking into alternative vendors who offer this (Ron 11/15).

c) Review mist collector for machining center – Oct. 2014. Install to capture and contain emissions of oily mist from machining center. It was decided that a mist collector would not be needed as this equipment is currently only operating on one shift. CLOSED

## F'16

a) Review eliminating MEK in paint departments (reclaimed). New e-solvent (NMP) for testing in both paint departments. Look into alternative vendors (Ron 11/15)

- Federally exempt solvent , higher flashpoint, Non-hazardous waste.

b) Explore e-lubricant alternatives (metal working coolants and oils) Ron/Ray- Feb. 2016



# Improve Environmental Compliance Management

## F'15

- a) Install air/fume collectors for dept. 43 weld- Oct. 2014. This will control airborne weld smoke/fumes in the plant and keep the work areas more clean. Moved to Spring 2016
- b) Plan for planting prairie grass/rain garden in south lawn to eliminate the need for mowing and maintenance- Spring 2015. We are considering planting in phases and will be seeking a third party to do soil testing and help with the planning for native plants. Moved to Spring 2016.

## F'16

- a) Install air/fume collectors for dept. 43 weld- Oct. 2014. This will control airborne weld smoke/fumes in the plant and keep the work areas more clean.  
Phase 1- small cab/support areas winter 2015.  
Phase 2- positioners Spring 2016.
- b) Replace TG collectors for laser machines in D45 with more efficient DFE's (Sheri/Ray Nov. 2015)
- c) Plan for planting prairie grass/rain garden in south lawn to eliminate the need for mowing and maintenance- We are considering planting in phases and will be seeking a third party to do soil testing and help with the planning for native plants. We will also be soliciting help from the B-W High School FFA. (Ron/Sheri- Plan Spring 2016)
- d) Pursue minor source air permit consideration (ROP 50). Currently utilizing HAPS free commercial paints. Review VOC's and determine ROP 50 option. Ron/Patrick Nov. 2015



# Reduce Energy Consumption

## F15

- a) HVAC Upgrade (Multiple phases)- Install automated system and sensors to maintain heating and cooling during occupancy periods and lower usage during weekend and non-occupancy hours.
  - Upgrade production floor HVAC June 2015 . Moved to October 2015
  - Replace north lunchroom with more efficient HVAC system June 2015. COMPLETE
- b) Update outdoor parking lot lighting from halide to LED. More energy efficient and improved light levels. Sept. 2014 COMPLETE (savings not yet calculated)

## F16

- a) Complete HVAC upgrades October 2015
- b) Upgrade plant lighting to more efficient LED (multiple stages)- 1st quarter- D45, 3<sup>rd</sup> quarter- D43



# Control of Oil and Fuel

## F15

Maintain above ground storage of oils below threshold of 1,320 gallons. Removal of 500 gallon diesel fuel AST Spring of 2015. Moved to Winter 2015. We will use remaining diesel prior to removal. Currently at 1,430 gallons. AST removal will place us at 930 gallons.

## F16



### **Contractor Management**

Evaluate current program for effectiveness- review training procedures, standard work, and other documents. Determine gaps in current program and adjust program to make it more robust, traceable, accountable, and deficiencies are effectively addressed.



# RESULTS OF 4th ANNUAL EARTH DAY ACTIVITIES

Week of April 20, 2015

Employees were allowed to bring in special wastes for disposal



- Spent Fluorescent bulbs- 60 pounds collected
- Waste Batteries- 120 pounds collected
- E-waste (small appliances)- 5,879 pounds
- Ink cartridges- 62 collected
- Cell phones - 8 used phones collected. These were donated to a local domestic abuse shelter.
- Private documents shredding- over 1000#'s
- Supported local Catholic church teen missions group by promoting large appliance recycling fundraising efforts.



200 maple trees were donated by  
Donaldson Company to our employees

# F15 Vendor recognition





Assessment Report.  
Donaldson Company Inc.  
Baldwin, WI

Report  
Author

**Rose Koronkiewicz**

Visit Start Date

02/18/2015

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## Introduction.

This report has been compiled by Rose Koronkiewicz and relates to the assessment activity detailed below:

Visit Ref/Type/Date/Duration	Certificate/Standard	Site address
8277409 Continuing Assessment (Surveillance) 02/18/2015 1 Day(s) No. Employees: 152	EMS 546560 BS EN ISO 14001:2004	Donaldson Co. Inc. 980 Locust Street Baldwin Wisconsin 54002 USA

### Client management system version(s):

EMS Manual 401.010.000 Rev. 1/2015

The objective of the assessment was to conduct a surveillance assessment and look for positive evidence to ensure that elements of the scope of certification and the requirements of the management standard are effectively addressed by the organization's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organizations specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan and where applicable to identify potential areas for improvement of the management system.

The scope of the assessment is the documented management system with relation to the requirements of ISO 14001:2004 and the defined assessment plan provided in terms of locations and areas of the system and organization to be assessed.

## Management Summary.

### Overall Conclusion

The objectives of this assessment have been achieved. I would like to thank all the audit participants for their assistance and co-operation which enabled the audit to run smoothly and to schedule. Based on the objective evidence detailed within this report, the areas assessed during the course of the visit were found to be effective.

There are no notices of violation, consent orders or pending litigation for environmental.

Corrective actions with respect to nonconformities raised at the last assessment have been reviewed and found to be effectively implemented.

No new nonconformities were identified during the assessment. Enhanced detail relating to the overall assessment findings is contained within subsequent sections of the report.

## Areas Assessed & Findings.

### **Management Processes, Communication : 4.6, 4.2, 4.4.3, 4.5.4**

Management Reviews are held twice per year. Minutes from January 21, 2015 were reviewed. There is comprehensive reporting on both the environmental and quality management system, and is considered a best practice. This includes reporting the status of regulatory compliance and reporting, permit updates, internal and external audits, external communications, and summary of the status of environmental objectives targets and programs. Presentations include what was completed in FY14 and what is planned for FY15. All input and output requirements of the standard are addressed. There is a call log that tracks any external communication and response to that communication. The organization is planning for Annual earth Day week in April. One of the planned activities is for employees to bring in wastes to be recycled, to promote recycling instead of items going to landfills. The management process is effective.

### **Internal Audits : 4.5.5, 4.5.4**

The FY2014 and FY2015 internal audit schedule and completed audits were reviewed. Four internal audits were completed since the last BSI audit. There is good objective evidence of conformance in the completed checklists. No new internal auditors have been added. There was evidence of corrective actions for minor nonconformities identified during the audit, and follow-up verification of implementation and effectiveness. Internal audit process is effective.

### **Nonconformity, Corrective and Preventive Action : 4.5.3, 4.5.4**

There is an environmental audit NCR log that is used to track that issues are corrected. There have been four internal nonconformities identified and addressed since the last BSI audit. There are also corrective actions, root cause analysis, and verification of implementation and effectiveness. Issues identified from external audits or inspections are also entered and tracked. The process for nonconformity, corrective and preventive actions is effective.

### **Environmental Aspects and Impacts : 4.3.1, 4.5.4**

The schedule for the annual line crawl and completed changes to the environmental aspects as a result were reviewed. There is a documented process for identification of environmental aspects and for determining their significance. There have only been minor changes for chemicals used on the line. Aspects were assessed for the facility and processes including; machining, forming, welding, paint/dip tank wash, assembly, tool & die/ model shop, and maintenance/ facility. Aspects are ranked based on regulatory, severity, probability and public concerns. There is a definition for each scoring. There are six (6) significant aspects identified from the list and all have documented operational controls. The legal and other requirements are identified for the environmental aspects. The environmental aspects and impacts process is effective.

### **Objectives, Targets and Environmental Programs : 4.3.3, 4.5.4**

Significant aspects were considered when establishing the objectives and targets. Completed FY14 objectives and targets were reviewed. FY15 objectives and targets include: 1) Improve Waste Management - dumpster covers, continue zero landfill plan, 2) Improve Chemical Management - recycled solvent and still in Dept. 35, eliminating MEK in paint departments, mist collector for machining areas 3) Improve Environmental Compliance Management - no weed killers, planting prairie grass, rain garden 4) Reduce Energy Consumption - HVAC upgrade in other areas, recommendations from energy assessment such as LED lighting 5) Control of Oil and Fuel - eliminate diesel AST. The projects have assigned responsibilities, means and timeframe to accomplish each. The process for objectives, targets and programs is effective.

### **Legal and Other Requirements and Compliance : 4.3.2, 4.5.2, 4.5.4**

Federal, State, Local and "Other" Requirements are identified in procedure 500.000.432. The Legal and other requirements are linked to the Environmental Aspects in the Environmental Aspects Matrix. The site has an Air Permit, General Storm Water Permit and General Industrial Waste Water Agreement with the Village of Baldwin. Updates to the Federal and State regulations are reviewed by Corporate EHS and relayed to the plant each year. Updates to the local regulations are maintained by the plant, and are reviewed annually and are included on the compliance calendar. The organization had an environmental compliance audit conducted by corporate on 9/30 -

10/2/2014 using Dakota Software. There are five action items that are assigned for completion. There was a comprehensive review of the local POTW ordinance with local officials. The format of the audit is broken up in Air, Water, Chemical, General, Universal and Hazardous waste plus Safety and other requirements. The plant also maintains a compliance calendar to track completion of all regulatory and other requirements throughout the year, and report this completion as part of management review. The process for legal and other requirements plus compliance was found to be effective.

**Contractor Management : 4.4.6, 4.5.1, 4.4.2, 4.5.4**

There is an EHS brochure for all visitors, and the organization has differentiated vendors who make deliveries vs contractors who actually perform work on site. There is a contractor brochure that covers EHS requirements with contractors. There is a list of types of vendors and contractors and their environmental impact. A contractor checklist and training are completed with contractors when they come on site and perform work. All personnel on site for the contractor are required to comply and their activities are audited and actions taken for those not conforming to EHS requirements are noted. This checklist is completed for different scopes of work performed by the contractor. A sample of environmental licenses and certifications were also reviewed. The contractor management process is effective.

**Waste Management : 4.4.6, 4.5.1, 4.5.4**

The site is a large quantity hazardous waste generator. The storage and labeling of hazardous and non-hazardous waste was good. Hazardous and non-hazardous waste manifests were reviewed to ensure monitoring and reporting was being done for these areas. Copies of hazardous waste shipped out of state were sent to the DNR. Reports were reviewed and completed at prescribed intervals. All manifests were being returned within the 30 day limit and annual reporting is being sent to the DNR documenting totals for hazardous waste. The 2014 annual hazardous waste report submitted in 2015 was reviewed. There are several work instructions for handling waste that are very detailed, and there was evidence of training on updates to the procedures. Waste profiles were also reviewed. There is a new waste stream with the solvent contaminated wipes and there was a waste profile and new procedure created for this waste stream. The Waste Management process is effective.

**Energy Management : 4.4.6, 4.5.1, 4.5.4**

The two primary energy consumption sources are gas and electric. Gas and electrical usage improvements are tracked by project. Planned and completed projects were reviewed. The energy management process is effective.

During the course of the visit logos were found to be used correctly.

## Minor Nonconformities Raised at Last Assessment.

Ref	Area/Process	Clause
1080926N1	Roof And Grounds/ Shop Walk	4.4.6
Scope	EMS 546560	
Details:	The process for waste labeling is not effectively maintained.	
Requirements:	<p>Operational control - The organization shall identify and plan those operations that are associated with the identified significant environmental aspects consistent with its environmental policy, objectives and targets, in order to ensure that they are carried out under specified conditions, by</p> <ul style="list-style-type: none"> <li>a) establishing, implementing and maintaining a documented procedure(s) to control situations where their absence could lead to deviation from the environmental policy, objectives and targets, and</li> <li>b) stipulating the operating criteria in the procedure(s), and</li> <li>c) establishing, implementing and maintaining procedures related to the identified significant environmental aspects of goods and services used by the organization and communicating applicable procedures and requirements to suppliers, including contractors.</li> </ul>	
Objective Evidence:	There was a 55 gallon drum in the laser area that was labeled Paint Filter Dust/Debris that was actually laser dust from the dust collector.	
Actions:	Reviewed the client's containment and corrective action. Reviewed the new process flow that defines how waste labels are handled. Reviewed label locations on the shop floor, and waste labeling for laser dust, paint materials, solvent contaminated waste, landfill waste, recycling. All wastes audited were properly labeled. Corrective action is effective and closed.	
Closed?:	Yes	

Ref	Area/Process	Clause
1080926N2	Roof And Grounds/ Shop Walk	4.4.7
Scope	EMS 546560	
Details:	The emergency management process is not effectively maintained.	
Requirements:	<p>Emergency preparedness and response</p> <p>The organization shall establish, implement and maintain a procedure(s) to identify potential emergency situations and potential accidents that can have an impact(s) on the environment and how it will respond to them.</p> <p>The organization shall respond to actual emergency situations and accidents and prevent or mitigate associated adverse environmental impacts.</p> <p>The organization shall periodically review and, where necessary, revise its emergency preparedness and response procedures, in particular, after the occurrence of accidents or emergency situations.</p> <p>The organization shall also periodically test such procedures where practicable.</p>	
Objective	There were fans blocking the access to the fire suppression system.	

Evidence:	
Actions:	Reviewed the client's containment and corrective action. Reviewed floor markings that indicate the area is to remain open, and added signage. Reviewed access areas for emergency response and they were accessible and not blocked. Corrective action is effective and closed.
Closed?:	Yes

## Shift Details.

An evaluation of the shift patterns and processes undertaken on them has been completed and it has been concluded that sufficient evidence of conformance from all shifts can be seen during the normal assessment times.

## Assessment Participants.

On behalf of the organization:

Name	Position
Ron DeMotts	EHS Supervisor
Thomas L. Carlson	Operations Manager
Ben Haefner	Engineering Manager
Nan McMurrin	PC Manager
Dustin Chenoweth	Quality Manager
Sheri Weber	Operations Manager
Thomas L. Carlson	Plant Manager
Darcy Larson	HR Manager

The assessment was conducted on behalf of BSI by:

Name	Position
Rose Koronkiewicz	Team Leader

## Continuing Assessment.

The program of continuing assessment is detailed below.

Site Address	Certificate Reference/Visit Cycle	
Donaldson Co. Inc. 980 Locust Street Baldwin Wisconsin 54002 USA	EMS 546560	
	Visit interval:	6 months
	Visit duration:	1 Days
	Next re-certification:	06/01/2015

Re-certification will be conducted on completion of the cycle, or sooner as required. An entire system re-assessment visit will be required.

## Re-certification Plan.

DONALD-0009500186-027|EMS 546560

Business area/Location	Date (mm/yy):	Visit1	Visit2	Visit3	Visit4	Visit5	Visit6
	Duration (days):	02/13	8/13	2/14	8/14	2/15	6/15
Air Management			X		X		X
Aspects/Legal & Other Requirements		X	X	X	X	X	X
Chemical Management		X			X		X
Communication				X	X	X	X
Contractor Management				X		X	X
Corrective/ Preventive Action		X	X	X	X	X	X
Emergency Response				X			X
Energy Management				X		X	X
Inside and Outside Walkabout					X		X
Internal Audits/Compliance Evaluation		X	X	X	X	X	X
Management Processes - Performance		X	X	X	X	X	X
Training/ Competence		X	X	X		X	X
Waste Management		X				X	X
Water Management			X		X		X

## Next Visit Plan.

### Visit objectives:

The objective of the assessment is to conduct a re-assessment of the existing certification to ensure the elements of the scope of registration and the requirements of the management standard are effectively addressed by the organization's management system.

Date	Assessor	Time	Area/Process	Clause
06/22/2015	Rose Koronkiewicz	8:00	Opening Meeting	
			Aspects and Impacts Analysis Management System, Objectives, Targets and Programs, Internal audits, corrective Actions, Management review, compliance evaluation Top Management Interview	4.1, 4.2, 4.3.1, 4.3.3, 4.4.1, 4.3.3, 4.4.3, 4.5.2, 4.5.5, 4.5.3, 4.6
		12:00	LUNCH	
		12:30	Legal and Other Requirements	4.3.2
			Emergency Response	4.4.7, 4.5.4
		4:00	Daily Debrief Meeting	
		4:30	Auditor Departs	
06/23/2015	Rose Koronkiewicz	8:00	Air Management	4.4.6, 4.5.1, 4.5.4
		12:00	LUNCH	
		12:30	Water Management	4.4.6, 4.5.1, 4.5.4
		4:00	Daily Debrief Meeting	
		4:30	Auditor Departs	
06/24/2015	Rose Koronkiewicz	8:00	Chemical Management	4.4.6, 4.5.1, 4.5.4
		10:30	Energy Management	4.4.6, 4.5.1, 4.5.4
		12:00	LUNCH	
		12:30	Waste Management	4.4.6, 4.5.1, 4.5.4
		4:00	Daily Debrief Meeting	
		4:30	Auditor Departs	
06/25/2015	Rose Koronkiewicz	8:00	Contractor Management	4.4.2, 4.4.6, 4.5.4
		10:00	Maintenance - Environmental	4.4.6, 4.5.1, 4.5.4
		12:00	LUNCH	

		12:30	Roof & Grounds	4.4.6, 4.5.1, 4.5.4
		2:00	Write Report/ Prep for Closing	4.4.3, 4.4.6, 4.5.1, 4.5.4
		4:00	Closing Meeting	
		4:30	Auditor Departs	

Please note that BSI reserves the right to apply a charge equivalent to the full daily rate for cancellation of the visit by the organization within 30 days of an agreed visit date. It is a condition of Registration that a deputy management representative be nominated. It is expected that the deputy would stand in should the management representative find themselves unavailable to attend an agreed visit within 30 days of its conduct.

## Notes.

The assessment was based on sampling and therefore nonconformities may exist which have not been identified.

If you wish to distribute copies of this report external to your organization, then all pages must be included.

BSI, its staff and agents shall keep confidential all information relating to your organization and shall not disclose any such information to any third party, except that in the public domain or required by law or relevant accreditation bodies. BSI staff, agents and accreditation bodies have signed individual confidentiality undertakings and will only receive confidential information on a 'need to know' basis.

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As part of BSI's Terms, it is necessary for you to notify BSI of any of the following: Major changes to Management System; Change of ownership, merger or acquisition; Significant change to employee numbers; Introduction of new products/processes; Introduction of new customers; Initiation of customer-enforced sanctions. Notification should be made to your Client Manager within 5 business days of occurrence. Your Client Manager will evaluate the impact of the notification, review this with the BSI Scheme Manager and contact you as necessary to discuss any additional activities required as a result.

This report and related documents is prepared for and only for BSI's client and for no other purpose. As such, BSI does not accept or assume any responsibility (legal or otherwise) or accept any liability for or in connection with any other purpose for which the Report may be used, or to any other person to whom the Report is shown or in to whose hands it may come, and no other persons shall be entitled to rely on the Report.

Should you wish to speak with BSI in relation to your registration, please contact our Operations Support Team:

BSI Management Systems  
 12950 Worldgate Drive  
 Suite 800  
 Herndon  
 VA  
 20170  
 Tel: +1 (800) 862 4977 Fax: +1 (703) 437 9001

## Regulatory Compliance.

BSI conditions of contract for this visit require that BSI be informed of all relevant regulatory non-compliance or incidents that require notification to any regulatory authority. Acceptance of this report by the client signifies that all such issues have been disclosed as part of the assessment process and agreement that any such non-compliance or incidents occurring after this visit will be notified to the BSI client manager as soon as practical after the event.



# Assessment Report.

## Donaldson Company Inc.

Report  
Author

**Rose Koronkiewicz**

Visit Start Date

06/22/2015

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## Introduction.

This report has been compiled by Rose Koronkiewicz and relates to the assessment activity detailed below:

Visit Ref/Type/Date/Duration	Certificate/Standard	Site address
8188150 Re-certification Audit (RA Opt 2) 06/22/2015 4 Day(s) No. Employees: 154	EMS 546560 BS EN ISO 14001:2004	Donaldson Co. Inc. 980 Locust Street Baldwin Wisconsin 54002 USA

### Client management system version(s):

EMS Manual 401.010.000 Rev. 1/2015 (EMS Documentation 000.000.000C Rev 3/23/15)

The objective of the assessment was to conduct a re-assessment of the existing certification to ensure the elements of the scope of registration and the requirements of the management standard are effectively addressed by the organization's management system.

## Management Summary.

### Overall Conclusion

There are no environmental related notices of violations, consent orders or pending litigation.

We are pleased to recommend the continuation of your certification. A recommendation is made subject to submission and acceptance of the client's corrective action plan. The objectives of this assessment have been achieved. I would like to thank all the audit participants for their assistance and co-operation which enabled the audit to run smoothly and to schedule.

Based on the objective evidence detailed within this report, the areas assessed during the course of the visit were found to be effective, except for the minor nonconformities identified.

There were no outstanding nonconformities to review from previous assessments.

2 Minor nonconformities requiring attention were identified. These, along with other findings, are contained within subsequent sections of the report.

A minor nonconformity relates to a single identified lapse, which in itself would not indicate a breakdown in the management system's ability to effectively control the processes for which it was intended. It is necessary to investigate the underlying cause of any issue to determine corrective action. The proposed action will be reviewed for effective implementation at the next assessment.

**Please submit a plan to BSI detailing the nonconformity, the cause, correction and your proposed corrective action, with responsibilities and timescales allocated. The plan is to be submitted no later than 07/17/2015 by e-mail to your assessor, referencing the report number.**

## Mandatory Requirements – Re-Certification.

### **Review of assessment finding regarding conformity, effectiveness and relevance of the management system:**

The organization has had five 1 day surveillance audits for this past three year certification cycle: 2/13 - 0 NCRs, 8/13 - 0 NCRs, 2/14 - 0 NCRs, 8/14 - 2 minor NCRs, 2/15 - 0 NCRs. The organization has a robust EMS and monitors, maintains and improves each year. They take advantage of information shared by other Donaldson plants during the monthly EHS calls. There is evidence through document revisions of continued improvements made to the EMS.

### **Management system strategy and objectives:**

The organization has objectives, targets and programs to continue to improve including applying for a minor source for air emissions and removal of the diesel fuel tank. Clarification and improvements are also made to the EMS documentation.

### **Review of progress in relation to the organisation's objectives:**

The organization continues to focus on the significant environmental aspects by completing projects and continuing to add new projects. These are regularly reported at management review.

### **Review of assessment progress and the re-certification plan:**

154 employees - LOW Complexity based on A513 review , 2 shifts  
6 days minus 15% for knowledge of client management system and 15% for lower complexity rating is 6 days.  
Stage 1: 2 days, Stage 2: 4 days, SV: 2 days per year, RE: 4 days

### **BSI Client Management Impartiality and Surveillance Strategy:**

Rose Koronkiewicz and Judy Ervin have been the two EMS auditors this past certification cycle and have the required codes. Rose will be the EMS auditor for this next certification cycle

### **Do you want the current Total assessment days / Cycle to continue ?**

Yes

## Areas Assessed & Findings.

### **Management Processes, Communication : 4.6, 4.2, 4.4.3, 4.5.4**

Management Reviews are held twice per year. Minutes from June 17, 2015 were reviewed. There is comprehensive reporting on both the environmental management system, and is considered a best practice. This includes reporting the status of regulatory compliance and reporting, permit updates, internal and external audits, external communications, and summary of the status of environmental objectives targets and programs. All input and output requirements of the standard are addressed. There is a call log that tracks any external communication and response to that communication. The organization's Annual earth Day in April 20, 2015 was a success, including identifying a local school that would take large appliances for the kids to recycle to generate funding for mission projects. Another activity is for employees to bring in wastes to be recycled, to promote recycling instead of items going to landfills. Also, every employee gets a tree to plant. The management process is effective.

### **Environmental Aspects and Impacts : 4.3.1, 4.5.4**

There are no changes to the environmental aspects. The annual line crawl to confirm chemicals in use throughout the plant is planned for July. There is a documented process for identification of environmental aspects and for determining their significance. Aspects were assessed for the facility and processes including; machining, forming, welding, paint/dip tank wash, assembly, tool & die/ model shop, and maintenance/ facility. Aspects are ranked based on regulatory, severity, probability and public concerns. There is a definition for each scoring. There are six (6) significant aspects identified from the list and all have documented operational controls. The legal and other requirements are identified for the environmental aspects.

The APD process for new product launches has questions on the manufacturing list for environmental aspects, chemicals, ergonomics and safety. So any changes that could impact the environmental aspects is reviewed as part of this process. CERs (Capital expenditure Requests) also have an EHS questionnaire that is evaluated for the impact. Three new CERs completed EHS questionnaires for the spot welder, vertical mill replacement and DFE were reviewed. The environmental aspects and impacts process is effective.

### **Objectives, Targets and Environmental Programs : 4.3.3, 4.5.4**

Significant aspects were considered when establishing the objectives and targets. FY15 objectives and targets include: 1) Improve Waste Management - dumpster covers, continue zero landfill plan, 2) Improve Chemical Management - esolvent trials planned to replace MEK in paint departments 3) Improve Environmental Compliance Management - install air/fume collectors, rain garden 4) Reduce Energy Consumption - HVAC upgrade in other areas, lunchroom efficient HVAC completed, LED lighting in the parking lot completed, 5) Control of Oil and Fuel - eliminate diesel AST is still in process. The projects have assigned responsibilities, means and timeframe to accomplish each. The process for objectives, targets and programs is effective.

### **Internal Audits : 4.5.5, 4.5.4**

The FY2015 internal audit schedule and completed audits were reviewed. Two internal audits were completed since the last BSI audit. There is good objective evidence of conformance in the completed checklists. No new internal auditors have been added. There was evidence of corrective actions for minor nonconformities identified during the audit, and follow-up verification of implementation and effectiveness. Internal audit process is effective.

### **Nonconformity, Corrective and Preventive Action : 4.5.3, 4.5.4**

There is an environmental audit NCR log that is used to track issues. There is a separate list for internal audit corrective actions. There are also corrective actions, root cause analysis, and verification of implementation and effectiveness. Issues identified from external audits or inspections are also entered and tracked. The process for nonconformity, corrective and preventive actions is effective.

**Legal and Other Requirements and Compliance : 4.3.2, 4.5.2, 4.5.4**

Federal, State, Local and "Other" Requirements are identified in procedure 500.000.432. The Legal and other requirements are linked to the Environmental Aspects in the Environmental Aspects Matrix. The site has an Air Permit, General Storm Water Permit and General Industrial Waste Water Agreement with the Village of Baldwin. Updates to the Federal and State regulations are reviewed by Corporate EHS and relayed to the plant each year. Updates to the local regulations are maintained by the plant, and are reviewed annually and are included on the compliance calendar. The organization had an environmental compliance audit conducted by corporate on 9/30 - 10/2/2014 using Dakota Software. There are five action items that are near completion. The format of the audit is broken up in Air, Water, Chemical, General, Universal and Hazardous waste plus and other requirements. The plant also maintains a compliance calendar to track completion of all regulatory and other requirements throughout the year, and report this completion as part of management review. The compliance calendar is also posted to the Corporate EHS sharepoint site monthly. The organization is Wisconsin Green Tier I and submits their objectives and audit reports annually. The process for legal and other requirements plus compliance was found to be effective.

**Emergency Response : 4.4.7, 4.5.4**

The organization has a written emergency contingency plan that was updated 6/5/15. The Emergency Contingency Plan Checklist 424.005.002 was completed by the Plant Manager. The emergency contingency plan cover various topics to include emergency procedures, alarms, communicating with the media, telephone contact information, fire emergency, tornado emergency, power outages, bomb threat, evacuation emergency and spill control procedures, chemical release and compressed gas release. Within the contingency plan, training/drill requirements were specified. Verified the annual training records of employees on first and second shift. The fire inspection included a review of fire extinguishers, exit lights, alarms, sprinkler and fire suppression system. The records of completing the deficiencies from the 10/14 sprinkler system inspection were not available. (See NCR) Also, reviewed monthly inspections of fire extinguishers. The organization also has an SPCC, SWPPP, Malfunction Prevention and Abatement Plan. The emergency response process is effective, except for the minor nonconformity.

**Air Management : 4.3.2, 4.4.6, 4.5.1, 4.5.4**

The emissions database work instruction is very detailed and describes updating the emission components when SDS are updated. Information is extracted from Oracle for both production and MRO materials. The 12 month average calculations were reviewed. The 2014 air emissions summary reporting was reviewed, along with the annual compliance certification. The NR445 & NR 438 daily and hourly monitoring reports were reviewed. The new air operating permit 656031860-P20 was reviewed. The two semi-annual monitoring reports for 2014 were reviewed. The organization is working with the WI DNR to apply as a minor source rather than a major source based on their operations. The air management process is effective.

**Water Management : 4.3.2, 4.4.6, 4.5.1, 4.5.4**

The organization does pretreatment and the semi-annual reports for 2014 were reviewed, which includes the Commercial Test Lab results. There are plans to set up a regular PM to clean the pit to prevent any high levels of metals. There is a log that tracks the discharge of tanks to the POTW and records the pH levels. Discharge to the local POTW is monitored at the time of discharge and reported to the local POTW.

The organization has a general storm water discharge permit. Quarterly and annual inspection records were reviewed for the outfalls. During the fence to fence walk, there are 7 outfalls that are identified and marked. The water management process is effective.

**Chemical Management : 4.3.2, 4.4.6, 4.5.1, 4.5.4**

Reviewed the completed and submitted Tier II report with three reported chemicals - lead and sulfuric acids from forklift batteries and paint/solvents. Calculations were reviewed for TRI report. MSDS On line was checked for various chemicals sampled throughout the plant and were available. Review and approval of new chemicals since the last BSI audit were reviewed. Secondary containers were labeled throughout the shop. The paint vault was reviewed, and containers are grounded. Those used at the paint line are also grounded. Compressed gas cylinders were secured. The chemical management process is effective.

**Energy Management : 4.3.2, 4.4.6, 4.5.1, 4.5.4**

The two primary energy consumption sources are gas and electric. Gas and electrical usage improvements are tracked by project. Planned and completed projects were reviewed. The energy management process is effective.

**Waste Management : 4.3.2, 4.4.6, 4.5.1, 4.5.4**

The site is a large quantity hazardous waste generator. The storage and labeling of hazardous and non-hazardous waste was good. Hazardous and non-hazardous waste manifests were reviewed to ensure monitoring and reporting was being done. Copies of hazardous waste manifests shipped out of state were sent to the DNR. Reports were reviewed and completed at prescribed intervals. All manifests were being returned within the 30 day limit and annual reporting is being sent to the DNR documenting totals for hazardous waste. The 2014 annual hazardous waste report was reviewed. There are several work instructions for handling waste that are very detailed, and there was evidence of training on updates to the procedures. Waste profiles were also reviewed. There is a new waste stream with the solvent contaminated wipes and there was a waste profile and new procedure created for this waste stream. The Waste Management process is effective.

**Contractor Management : 4.4.6, 4.5.1, 4.4.2, 4.5.4**

There is an EHS brochure for all visitors, and the organization has differentiated vendors who make deliveries vs contractors who actually perform work on site. There is a contractor brochure that covers EHS requirements with contractors. There is a list of types of vendors and contractors and their environmental impact. A contractor checklist and training are completed with contractors each time they come on site for a given project and perform work. All personnel on site for the contractor are required to comply and their activities are audited and actions taken for those not conforming to EHS requirements are noted. A sample of environmental licenses and certifications were also reviewed. The contractor management process is effective.

**Roof And Grounds/ Shop Walk : 4.4.2, 4.4.6, 4.5.1, 4.5.4**

There have not been any changes to the roof, and the stack map was reviewed. A fence to fence walk was conducted. There is completed product in the lot covered with plastic wrap. There is an liquid oxygen tank, nitrogen tank and CO2 tank along the facility wall. There is a diesel fuel tank with secondary containment. There are plans to eliminate the onsite diesel fuel tank. There are plans to put in rain gardens. The organization is working with the DNR and plan to make application for any required permits with the Village of Baldwin. All waste containers are labeled. Employees interviewed were familiar with chemical management, waste management, emergency response and the environmental policy. The roof, grounds and shop are well maintained.

**HR/Training : 4.4.2, 4.5.4**

Training records were reviewed for the following: environmental policy, general ISO 14001 awareness, emergency response plans, SWPPP, SPCC, RCRA hazardous waste, DOT hazardous material, EMS procedures and work instructions. The training plan was also reviewed for required annual EHS training. Employees interviewed were knowledgeable about the EHS requirements. The training, awareness and competence process is effective.

During the course of the visit logos were found to be used correctly.

## Minor Nonconformities Arising from this Assessment.

Ref	Area/Process	Clause
1201423N1	Emergency Response	4.5.3
Scope	EMS 546560	
Details:	The process to ensure actions are taken shall be appropriate to the magnitude of the problems is not fully effective.	
Requirements:	<p>Nonconformity, corrective action and preventive action</p> <p>The organization shall establish, implement and maintain a procedure(s) for dealing with actual and potential nonconformity(ies) and for taking corrective action and preventive action. The procedure(s) shall define requirements for</p> <ul style="list-style-type: none"> <li>a) identifying and correcting nonconformity(ies) and taking action(s) to mitigate their environmental impacts,</li> <li>b) investigating nonconformity(ies), determining their cause(s) and taking actions in order to avoid their recurrence,</li> <li>c) evaluating the need for action(s) to prevent nonconformity(ies) and implementing appropriate actions designed to avoid their occurrence,</li> <li>d) recording the results of corrective action(s) and preventive action(s) taken, and</li> <li>e) reviewing the effectiveness of corrective action(s) and preventive action(s) taken.</li> </ul> <p>Actions taken shall be appropriate to the magnitude of the problems and the environmental impacts encountered.</p> <p>The organization shall ensure that any necessary changes are made to environmental management system documentation.</p>	
Objective Evidence:	The sprinkler system inspection performed in October 2014 identified deficiencies but there is no record of the actions taken to correct the deficiencies. (Another inspection was performed in June 2015 which shows that previous deficiencies were addressed and there are new deficiencies to address. These are being addressed with the contractor.)	

Ref	Area/Process	Clause
1201423N2	HR/Training	4.4.2
Scope	EMS 546560	
Details:	The training process is not effectively maintained.	
Requirements:	<p>Competence, training and awareness - The organization shall ensure that any person(s) performing tasks for it or on its behalf that have the potential to cause a significant environmental impact(s) identified by the organization is (are) competent on the basis of appropriate education, training or experience, and shall retain associated records.</p> <p>The organization shall identify training needs associated with its environmental aspects and its environmental management system. It shall provide training or take other action to meet these needs, and shall retain associated records.</p> <p>The organization shall establish, implement and maintain a procedure(s) to make persons working for it or on its behalf aware of</p> <ul style="list-style-type: none"> <li>a) the importance of conformity with the environmental policy and procedures and with the requirements of the environmental management system,</li> <li>b) the significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance,</li> <li>c) their roles and responsibilities in achieving conformity with the requirements of the environmental management system, and</li> <li>d) the potential consequences of departure from specified procedures.</li> </ul>	
Objective Evidence:	SB5616000 Management of Solvent contaminated wipes work instruction shows that it applies to all departments for required training. There is no record of training for departments 17, 18, 27 and 20.	

## Shift Details.

An evaluation of the shift patterns and processes undertaken on them has been completed and it has been concluded that sufficient evidence of conformance from all shifts can be seen during the normal assessment times.

## Assessment Participants.

On behalf of the organization:

Name	Position
Ron DeMotts	EHS Supervisor
Thomas L. Carlson	Plant Manager
Ben Haefner	Engineering Manager
Nan McMurrin	PC Manager
Dustin Chenoweth	Quality Manager
Sheri Weber	Operations Manager
Darcy Larson	HR Manager
Production	Various

The assessment was conducted on behalf of BSI by:

Name	Position
Rose Koronkiewicz	Team Leader

## Continuing Assessment.

The program of continuing assessment is detailed below.

Site Address	Certificate Reference/Visit Cycle	
Donaldson Co. Inc. 980 Locust Street Baldwin Wisconsin 54002 USA	EMS 546560	
	Visit interval:	6 months
	Visit duration:	1 Days
	Next re-certification:	06/01/2018

Re-certification will be conducted on completion of the cycle, or sooner as required. An entire system re-assessment visit will be required.

## Re-certification Plan.

**Report  
Author**

**Rose Koronkiewicz**

Visit Start Date 06/22/2015



DONALD-0009500186-027|EMS 546560

		Visit1	Visit2	Visit3	Visit4	Visit5	Visit6
Business area/Location	Date (mm/yy):	02/16	8/16	2/17	8/17	2/18	6/18
	Duration (days):	1.0	1.0	1.0	1.0	1.0	4.0
Air Management			X		X		X
Aspects/Legal & Other Requirements		X	X	X	X	X	X
Chemical Management		X			X		X
Communication				X	X	X	X
Contractor Management				X		X	X
Corrective/ Preventive Action		X	X	X	X	X	X
Effectiveness of last visit corrective actions		X				X	X
Emergency Response				X			X
Energy Management				X		X	X
Inside and Outside Walkabout					X		X
Internal Audits/Compliance Evaluation		X	X	X	X	X	X
Management Processes - Performance		X	X	X	X	X	X
Training/ Competence		X	X	X		X	X
Waste Management		X				X	X
Water Management			X		X		X

## Next Visit Plan.

### Visit objectives:

The objective of the assessment is to conduct a surveillance assessment and look for positive evidence to ensure the elements of the scope of certification and the requirements of the management standard are effectively addressed by the organization's management system and that the system is demonstrating the ability to support the achievement of statutory, regulatory and contractual requirements and the organizations specified objectives, as applicable with regard to the scope of the management standard, and to confirm the on-going achievement and applicability of the forward strategic plan.

The scope of the assessment is the documented management system with relation to the requirements of ISO 14001:2004 and the defined assessment plan provided in terms of locations and areas of the system and organization to be assessed.

Date	Assessor	Time	Area/Process	Clause
02/15/2016	Rose Koronkiewicz	8:00	Opening Meeting	
		8:20	Org/ EMS Changes	
			Management Processes, Communication	4.6
			Environmental Aspects	4.3.1
			Objectives, Targets and Programs	4.3.3
			Corrective/Preventive Actions	4.5.3
			Internal Audits	4.5.5
			Legal and Other Requirements	4.3.2
			Compliance Evaluation	4.5.2
		11:00	HR/ Training	4.2.2, 4.5.4
		12:00	LUNCH	
		12:30	Contractor Management	4.4.6, 4.5.1, 4.5.4
			Waste Management	4.4.6, 4.5.1, 4.5.4
		3:30	Write Report/ Prep for Closing	
		4:30	Closing Meeting - EMS	
		5:00	Auditors Depart	

Please note that BSI reserves the right to apply a charge equivalent to the full daily rate for cancellation of the visit by the organization within 30 days of an agreed visit date. It is a condition of Registration that a deputy management representative be nominated. It is expected that the deputy would stand in should the management representative find themselves unavailable to attend an agreed visit within 30 days of its conduct.

## Notes.

The assessment was based on sampling and therefore nonconformities may exist which have not been identified.

If you wish to distribute copies of this report external to your organization, then all pages must be included.

BSI, its staff and agents shall keep confidential all information relating to your organization and shall not disclose any such information to any third party, except that in the public domain or required by law or relevant accreditation bodies. BSI staff, agents and accreditation bodies have signed individual confidentiality undertakings and will only receive confidential information on a 'need to know' basis.

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**As part of BSI's Terms, it is necessary for you to notify BSI of any of the following: Major changes to Management System; Change of ownership, merger or acquisition; Significant change to employee numbers; Introduction of new products/processes; Introduction of new customers; Initiation of customer-enforced sanctions. Notification should be made to your Client Manager within 5 business days of occurrence. Your Client Manager will evaluate the impact of the notification, review this with the BSI Scheme Manager and contact you as necessary to discuss any additional activities required as a result.**

This report and related documents is prepared for and only for BSI's client and for no other purpose. As such, BSI does not accept or assume any responsibility (legal or otherwise) or accept any liability for or in connection with any other purpose for which the Report may be used, or to any other person to whom the Report is shown or in to whose hands it may come, and no other persons shall be entitled to rely on the Report.

Should you wish to speak with BSI in relation to your registration, please contact our Operations Support Team:

BSI Management Systems  
12950 Worldgate Drive  
Suite 800  
Herndon  
VA  
20170  
Tel: +1 (800) 862 4977 Fax: +1 (703) 437 9001

## Regulatory Compliance.

BSI conditions of contract for this visit require that BSI be informed of all relevant regulatory non-compliance or incidents that require notification to any regulatory authority. Acceptance of this report by the client signifies that all such issues have been disclosed as part of the assessment process and agreement that any such non-compliance or incidents occurring after this visit will be notified to the BSI client manager as soon as practical after the event.

## Expected Outcomes for Accredited Certification.

### **What accredited certification means:**

The accredited certification process provides confidence that the organization has a management system that conforms to the applicable requirements of the certified standards covered within this assessment and scope of certification.

### **What accredited certification does not mean:**

It is important to recognize that certification defines the requirements for an organization's management system, not for its products or services. It does not imply that the organization is providing a superior product or service, or that the product, service or performance itself is certified as meeting the requirements of an ISO standard or specification or that the organisation can guarantee 100% product, service or performance conformity, though this should of course be a permanent goal.