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## Green Tier Commitment Outline for The TORO Company

Approval Date – June 29, 2012

Commitment Outline Updated: (02/07/2020)

The updates since participation started are:

- Updated general content, format and links
- Updated Annual Report Date
- Updated Project Coordinator
- Updated Single Point of Contact

### I. Environmental Management Systems (EMS) & Audit Requirements

Your EMS must either be ISO-certified, or you must demonstrate that it is functionally equivalent. For information on how to demonstrate the functional equivalency of your EMS, please see: <https://dnr.wi.gov/files/PDF/pubs/co/CO503.pdf>

You have supplied us with a copy of your ISO 14001 certification, satisfying initial Green Tier EMS requirements.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **June 29, 2013** and every year after that, you must perform an environmental management system audit. The department recommends that your first audit be completed by a DNR-approved outside environmental auditor.
- B. On or before, **June 29, 2015** and every third year, this audit **must** be completed by a DNR-approved outside EMS auditor. The list of approved auditors can be found at: <https://dnr.wi.gov/topic/GreenTier/Auditors.html>

### Provide an Annual Report

- A. **Annual Report Due Date** - We have mutually agreed that the deadline for your Green Tier annual report is **September 15**. (Please feel free to discuss alternative reporting dates with your Project Coordinator should your needs change.)
- B. **Reporting on Environmental Performance Commitments:** Your first report should follow the annual report instructions provided below and should provide data on your progress toward meeting your environmental performance commitments laid out in your Green Tier application or your previous year's Green Tier annual report.
- C. **Annually**, you will need to report progress on the commitments that you have made. For more details about annual reports and metrics, see the annual report instructions provided on the website; <https://dnr.wi.gov/topic/GreenTier/ReportInstructions.html>
- D. Please provide annual Green Tier Reports to: [GreenTier@Wisconsin.gov](mailto:GreenTier@Wisconsin.gov) and your Single Point of Contact.

## II. Work toward Superior Environmental Performance

Implement environmental improvements that aim to achieve Superior Environmental Performance as defined in Green Tier law. This means environmental performance that results in measurable or discernible improvement in the quality of the air, water, land, or natural resources, or in the protection of the environment, beyond that which is achieved under environmental requirements. More information on Superior Environmental Performance can be found here:

<https://dnr.wi.gov/topic/GreenTier/SuperiorEnvironmentalPerformance.html>

## III. Green Tier - Tier 1 – DNR Commitments

- A. **Single Point of Contact (SPOC):** Your single point of contact or SPOC is your liaison to the department, answering your questions or making connections within DNR or with other experts. Your SPOC is: Dan Helsel, Phone 715-284-1431, [Daniel.Helsel@Wisconsin.gov](mailto:Daniel.Helsel@Wisconsin.gov).
- B. **Green Tier Logo:** Green Tier participants may use the Green Tier logo on stationery, promotional and educational materials related to your facility. Logo files as well as the Green Tier Style Guide with additional guidelines and information are available online at: <https://wi-dnr.widencollective.com/portals/nkc57xuv/GreenTierBranding>. Your Project Coordinator can provide you with the current access code.
- C. **Recognition:** Along with the certificate of recognition, the department will host a [participant web page](#) for easy reference. Participants should provide information and pictures on their environmental efforts to populate the webpage. We will also promote your successes throughout your tenure in Green Tier using a variety of DNR communication channels.
- D. **Project Coordinators:** You should also feel free to contact your Project Coordinator for Green Tier specific information. Project Coordinators provide support to SPOCs and participants providing reminders on Green Tier requirement dates and by promoting a participant's successes. Your project coordinator is: Weston Wegener, Phone: 608-264-9753, Cell: 608-284-0908, [Weston.Wegener@Wisconsin.gov](mailto:Weston.Wegener@Wisconsin.gov).
- E. **Minimum Inspection Frequency:** Because you have implemented an EMS, you are entitled to inspections at the lowest frequency permitted by the programs under law. The department will work with you to determine how this will work for you.
- F. **Deferred Civil Action:** You are entitled to Deferred Civil Enforcement as described in statutes (299.83(6m)(d)). If you discover a violation of an existing environmental requirement, you are entitled to protection from any civil penalties that the department might otherwise impose if you:
  - 1. Notify the department
  - 2. Provide a corrective action plan and documentation of your Environmental Management System (EMS) adjustments that ensure the violation will not happen again, and
  - 3. Correct the violations within 90 days

**Notice:** Collection of this information is authorized under s. 299.83 Wis. Stat. Participation in Green Tier and completion of this form are voluntary. Personal information collected on this form, including such data as your name, address, phone number, etc., will be used in the implementation of Green Tier and will be made broadly available under the Green Tier program. Information will also be made accessible to requesters under Wisconsin's Public Records Law (ss. 19.32 - 19.39, Wis. Stats.). If you need to request confidential treatment of any information in order to protect a trade secret, please contact a DNR representative *prior* to submitting this form. Applications must be considered complete by the DNR in order to be processed. For complete application instructions, see "Green Tier Application Instructions," publication number CO-501.

This application is for... (check one):  Tier 1       Tier 2 (attach Letter of Intent to this form)

## I. Applicant Information

Contact Name	Title		
Thomas Nordwig	Finishing Engineer / Environmental Coordinator		
Street Address	City	State	ZIP Code
200 Sime Avenue	Tomah	WI	54660
Telephone Number	Fax Number	E-mail Address	
(608) 372-1409	(608) 372-1434	tom.nordwig@loro.com	

## II. Facility Information

Facility Name	County		
The Toro Company	Monroe		
Street Address	City	State	ZIP Code
200 Sime Avenue	Tomah	WI	54660
Mailing Address	City	State	ZIP Code
200 Sime Avenue	Tomah	WI	54660

Please provide all DNR Facility Identification numbers (FID #) that apply to the covered facility or activity.

FID# 642028970

## III. Scope of Green Tier Participation (check one)

- This application covers all activities at the facility listed in Section II.
- This application covers all activities at more than one facility. For each facility to be covered under this application provide the information from Section II on a separate page labeled **Attachment 1**.
- This application **does not** cover all activities at every covered facility. Please describe the exact scope of activities and facilities to be covered in the program on a separate page labeled **Attachment 1**.

## IV. Environmental Performance

Please provide the following information on a separate page labeled **Attachment 2**. Refer to the *Application Instructions* for definitions of environmental performance and superior environmental performance.

### Tier 1 Applicants:

- Describe your past and current environmental performance with respect to each covered facility or activity included in this application. Within this attachment establish a baseline date against which future progress can be measured.
- Describe your future plans for enhancing the environment with respect to the same facilities/activities.

### Tier 2 Applicants:

- Provide information demonstrating your record of superior environmental performance. Within this attachment establish a baseline date against which future progress can be measured.
- Describe the measures you propose to take to maintain and improve your superior environmental performance.

## V. Environmental Management System (EMS)

- |  |                                      |                          |              |
|--|--------------------------------------|--------------------------|--------------|
| a. Have you implemented an EMS that is certified to the ISO 14001 standard?  | <input checked="" type="radio"/> Yes | <input type="radio"/> No | (circle one) |
| b. Have you implemented an EMS that is functionally equivalent to ISO 14001? | <input checked="" type="radio"/> Yes | <input type="radio"/> No | (circle one) |

If you circled "No" for both questions, you are not eligible for Tier 2. Please proceed to Section VI only if you are applying for Tier 1.

If you circled "Yes" for either question, please provide a copy of the following documents labeled as **Attachment 3**:

- Proof of ISO 14001 certification OR functional equivalence (refer to *Application Instructions* for details)
- Environmental policy statement and scope statement
- Documented objectives and targets for the covered facilities/activities

## VI. Public Notice/Stakeholder Identification

Please provide in a separate document labeled **Attachment 4** a list of stakeholders whom you know or expect will have a strong interest in your Green Tier application, as well as contact information for those stakeholders. This information will help DNR expedite the processing of your application. Tier 2 applicants must provide additional information about stakeholder involvement in a Letter of Intent. Refer to *Application Instructions* for details.

## VII. Enforcement Record

Please review the Enforcement Record requirements described in the *Application Instructions* very carefully, and then check the appropriate box:

- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

If a waiver is requested, please provide information describing any requirements not met and a justification for the waiver request on a separate page labeled **Attachment 5**. Note that waivers will be granted only in exceptional circumstances.

## VIII. Tier 1 Applicant Statement of Commitments

I commit with my signature to the following statements and certify that all information provided in this application is true and correct under penalty of law:

- Implement, within one year of the date of this application, an EMS for each covered facility or activity that is certified to the ISO 14001 standard or is functionally equivalent to ISO 14001 as determined by DNR.
- Conduct annual EMS audits, with every 3<sup>rd</sup> EMS audit performed by a DNR-approved outside environmental auditor.
- Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- Submit to DNR an annual report on progress towards meeting objectives related to improved environmental performance for aspects regulated under chs. 29 to 31, 160, or 280 to 299, Wis. Stats., unregulated environmental aspects, or voluntary actions to restore, enhance, or preserve natural resources.

Applicant Signature <i>Thomas L. Mordwin</i>	Date Signed 3/6/12
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## IX. Tier 2 Applicant Statement of Commitments

I commit with my signature to the following statements and certify that all information provided in this application is true and correct under penalty of law:

- Conduct annual EMS audits performed by a DNR-approved outside environmental auditor.
- Conduct or have another person conduct an annual audit of compliance with environmental requirements that are applicable to the facilities and activities covered under Green Tier.
- Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- Submit to DNR an annual report on each compliance audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.

Applicant Signature <i>Thomas L. Mordwin</i>	Date Signed 3/6/12
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## X. For Department Use Only

Date Received	Initials of Reviewer	Status	Date Returned to Applicant for Additional Information	Date Denied	Date Approved

## Attachment 2

### Environmental Performance:

The Toro Company – Tomah plant is an ISO 14001-2004 certified facility since 2011. Toro – Tomah manufacturing plant has a strong commitment and concern with respect to the environment. The Tomah manufacturing facility has previously adopted the following environmental programs; low VOC emissions through water based coatings and high solids paint, waste minimization through recycling of paper, wood, metals, plastics, and solvents. We have also implemented the following energy savings projects; re-lamped our plant with energy saving florescent bulbs, added occupancy sensors to office lighting, replaced plant air compressors with energy saving models along with using heat recovery to aid with plant heating, and purchased new MIG wire welding equipment which is more energy efficient. Toro is also a member of Monroe County's LEPC (Local Emergency Planning Committee). Moving forward Toro will continue to make a strong commitment to the environment and sustainability. Our 2012 Environmental Targets and Objectives include items which we look to improve for this year and the future. We look forward to opportunities to continue to reduce wastes and sustaining the environment.

**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**

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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.**

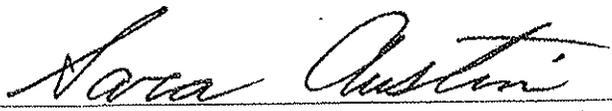
This certificate forms part of the approval identified by certificate number UQA 0107022

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**

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**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**

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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