



## INDIANA ENVIRONMENTAL STEWARDSHIP PROGRAM ANNUAL PERFORMANCE REPORT

State Form 53475 (R6 / 2-19)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
ENVIRONMENTAL STEWARDSHIP PROGRAM

Indiana Department of Environmental Management

Office of Program Support

MC 64-00, Room IGCN 1316

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Indianapolis, IN 46204-2251

Telephone: (800) 988-7901

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Please use this form if you are a member of the Indiana Environmental Stewardship Program (ESP) to report on progress toward objectives and targets AND certify ESP requirements continue to be achieved. Indiana ESP facilities must submit an Annual Performance Report (APR) by April 1<sup>st</sup> of every year, for each calendar year in which the entity has been a member for at least three (3) full months. Membership terms are renewed every four (4) years through submitting your APR. Your APR should be reviewed and signed by a senior manager at your facility prior to submittal. Once signed, e-mail the APR to IDEM at [esp@idem.IN.gov](mailto:esp@idem.IN.gov). Please do not include any confidential business information in your annual performance report. **Public access laws require IDEM to make the APR publicly available**, which may include posting all portions of your report on the Indiana ESP Web site. If you have any questions, please contact IDEM at [esp@idem.IN.gov](mailto:esp@idem.IN.gov) or (800) 988-7901.

### SECTION A

### FACILITY INFORMATION

Name of facility

TOYOTA BOSHOKU INDIANA

Name of parent company (if applicable)

TOYOTA BOSHOKU AMERICA

Street address (number and street)

1698 S 100 W

City / State / ZIP code

PRINCETON, IN 476701

Website of facility / company

TOYOTABOSHOKUAMERICA.COM

### CONTACT INFORMATION

Name of Contact (Mr. / Mrs. / Ms. / Dr.)

PHILIP W ALVEY

Title

EHS MANAGER

Telephone number

( 812 ) 632-8868

FAX number

( 812 ) 253-7175

E-mail address

[philip.alvey@toyota-boshoku.com](mailto:philip.alvey@toyota-boshoku.com)

Mailing address (if different from facility address)

City / State / ZIP Code

### REPORTING PERIOD

Reporting period dates from prior calendar year (mm/dd/yyyy – mm/dd/yyyy)

04/01/2019 - 3/31/2020

1a. Is this the fourth Annual Performance Report of your membership term?

☐ Yes—If yes, answer question 1b.

☒ No—If no, skip to the "Change in Information" section of this report.

1b. Do you wish to renew your Indiana Environmental Stewardship Program membership?

☒ Yes—If yes, please complete all sections of this annual report.

☐ No—If no, please complete all sections of this annual report except for Section F.

### CHANGE IN INFORMATION

In your ESP application and, perhaps, in previous annual performance reports, you described what your facility does or makes. Have there been any changes or additions to your facility's list of products or activities?

☐ Yes—If yes, please describe them: \_\_\_\_\_

☒ No

### SECTION B

### PUBLIC OUTREACH AND PERFORMANCE REPORTING

Why do we need this information?

IDEM needs to know how environmental information was shared with the public.

What do you need to do?

Describe how the facility has shared and plans to share environmental information.

Please briefly describe the activities that your facility conducted during this reporting period to interact with the community on environmental issues and to report publicly on its environmental performance.

Please indicate which of the following methods your facility plans to use to make its ESP Annual Performance Report available to the public. Please check as many as appropriate.

☐ Web site (<http://www>\_\_\_\_\_ ) ☐ Open house ☒ Meetings ☐ Press releases ☐ Other \_\_\_\_\_

## SECTION C

## ENVIRONMENTAL MANAGEMENT SYSTEM ASSESSMENT

## Why do we need this information?

Facilities need to have implemented an EMS that meets certain criteria and use an ISO 14001 EMS Lead Auditor at least every thirty-six (36) months to assess the EMS.

## What do you need to do?

Answer the following questions about your EMS.

1. What is the most recent date that an ISO 14001 EMS Lead Auditor performed an EMS assessment at your facility? 8/5/2019

2. Name, title, and organization of ISO 14001 EMS Lead Auditor who conducted the most recent EMS assessment: \_\_\_\_\_

NSF - MARK GOSTOMSKI LEAD AUDITOR - AUDIT REPORT ATTACHED

3. Is the date of the most recent EMS assessment performed by an ISO 14001 EMS Lead Auditor within the past thirty-six (36) months?

☒ Yes—If yes, skip to Question 4.

☐ No—If no, please have your ISO 14001 EMS Lead Auditor complete and sign the following checklist, indicating whether or not your EMS meets the listed criteria for ESP membership:

- ☐ Yes ☐ No Evidence of senior management support, commitment, and approval.
- ☐ Yes ☐ No A written environmental policy directed toward compliance, pollution prevention, and continuous improvement.
- ☐ Yes ☐ No Identification of the environmental aspects at the entity.
- ☐ Yes ☐ No Prioritization of the environmental aspects and a determination of those aspects deemed significant considering, at the minimum, environmental impacts and applicable laws and regulations.
- ☐ Yes ☐ No Established priorities, and environmental objectives and targets for continuous improvement in environmental performance and for ensuring compliance with applicable environmental laws, regulations, and permit conditions. Objectives and targets must go beyond current legal requirements and specify the environmental media, types of pollution to be prevented or reduced, implementation activities, and projected time frames.
- ☐ Yes ☐ No An established community outreach mechanism that includes identifying and responding to community concerns; informing the community of important matters that affect the community; and reporting on the EMS, including reporting to the public on the environmental policy and significant aspects.
- ☐ Yes ☐ No Incorporation of environmental and pollution prevention planning in the development of new products, processes, and services and modifications of existing processes.
- ☐ Yes ☐ No Evidence of clear responsibility for implementation, training, monitoring, EMS maintenance, taking corrective action, and ensuring compliance with applicable environmental laws, regulations, and permit conditions.
- ☐ Yes ☐ No Documentation of the implementation procedures and the results of implementation.
- ☐ Yes ☐ No Appropriate written EMS procedures.
- ☐ Yes ☐ No An annual evaluation of the EMS with written results provided to senior management and affected employees.

Signature of ISO 14001 EMS Lead Auditor

Date (month, day, year)

4. Were any deficiencies found during the most recent EMS assessment?

☐ Yes—If yes, describe any deficiencies found and the corrective action taken to address each deficiency: \_\_\_\_\_

☒ No

5. What type of protocol was used to perform the independent EMS assessment?

☒ ISO 14001:2015 Certified audit

☐ ESP Independent Assessment Protocol

☐ Other (please specify): \_\_\_\_\_

6. Is the EMS certified to a recognized standard?

☒ Yes—If yes, what standard does the EMS follow (please provide a copy of the most recent certificate)?

☒ ISO 14001:2015

☐ Responsible Care EMS

☐ Responsible Care 14001

☐ No

## SECTION C

ENVIRONMENTAL MANAGEMENT SYSTEM ASSESSMENT  
CONTINUED

7. When was the last Senior Management review of your EMS completed?  
Month / Year: 7/2019  
Who headed the review (name and title)? PHILIP ALVEY , EHS MANAGER
8. When did your facility last conduct an internal or corporate environmental compliance audit? Do not include inspections or site visits by regulatory organizations.  
Scope of the compliance audit: COMPLETE ENVIRONMENTAL PROGRAM  
Month(s) / Year(s): 12/2019  
Who conducted the audit(s) (e.g., facility staff, corporate, third party)? SCOTT SMITH - TBA ENVIRONMENTAL
9. Explain the emergencies experienced within the facility during the past year. Were the applicable emergency and contingency plans detailed in the EMS effective? What changes, if any, have been made to your facility's emergency or contingency plans?  
Isocynate leak. All plans were implemented and successfully excuted
10. Has your facility corrected all instances of potential environmental non-compliance and EMS non-conformance identified during your audits and other assessments?  
☒ Yes—If yes, briefly summarize corrective actions taken and other improvements made as a result of your EMS assessment(s) or compliance audit(s).  
Spill containment added, gauges calibrated, signage added  
☐ No—If no, please explain your plans to correct these instances.  
☒ No such instances identified.

## SECTION D

## ADDITIONAL INFORMATION

## Why do we need this information?

This information will help IDEM to effectively manage the Environmental Stewardship Program.

## What do you need to do?

Answer the questions as completely as possible.

1. In addition to ESP, please list environmental awards received or voluntary programs participated in during the past twelve (12) months.  
Partners for Polution Prevention
2. Has your facility taken advantage of any ESP incentives? If so, please describe the implementation process and list additional benefits IDEM should consider.  
Air permit assistance
3. If your facility was not registered to the ISO 14001 standard prior to becoming an ESP member, has ESP helped you to pursue registration? If so, how has ESP been instrumental in achieving registration?  
Was ISO14001 registered but we transitioned to 14001:2015 and the program helped understand and meet the transition requirements

## SECTION E

## ENVIRONMENTAL IMPROVEMENT INITIATIVE RESULTS

## Why do we need this information?

Facilities need to share the results of the environmental improvement initiative that was pursued during the reporting period. IDEM needs to report cumulative program reduction results.

## What do you need to do?

Reference Section F for "Category" and "Indicator" options to complete this section. Summarize your facility's progress on achieving the initiative you identified in the application or last year's APR. For assistance, please call (800) 988-7901 or email [esp@idem.IN.gov](mailto:esp@idem.IN.gov).

## Initiative #1

Category 1: <u>Air Emissions</u>	Baseline (indicate measurement unit)	Current (indicate measurement unit)	Cost Savings
Indicator 1: _____			
Calendar year	<u>2019</u>	<u>2019</u>	
Actual quantity (per year)	<u>13071</u>	<u>12137</u>	<u>\$122,624.86</u>
Production unit (select one)	Earned Labor Hours      Production units X      Production lbs. Other -- specify (e.g. Gallons, length, etc.)		
Production Quantity	<u>169929</u>	<u>144236</u>	<u>NA</u>
Normalization factor (Current year production ÷ Baseline year production) <u>.89</u>			
Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor <u>-22,877</u>			
Briefly describe how you achieved improvements for environmental initiative #1 or, if relevant, any circumstances that delayed progress. <u>Lower production quantity than planned. Motion sensors on all plant lighting, HVAC adjustments, LED lighting</u>			

## SECTION E

ENVIRONMENTAL IMPROVEMENT INITIATIVE RESULTS  
CONTINUED

## Initiative #2

Category 2: <u>Waste</u>	Baseline	Current	Cost Savings
Indicator 2: _____	(indicate measurement unit)	(indicate measurement unit)	
Calendar year	2019	2019	
Actual quantity (per year)	336	437	N/A
Production unit (select one)	Earned Labor Hours Other -- specify (e.g. Gallons, length, etc.)	Production units	Production lbs.
Production Quantity	169929	144236	NA
Normalization factor (Current year production ÷ Baseline year production) .89			
Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor -22,877			

Briefly describe *how* you achieved improvements for environmental initiative #2 or, if relevant, any circumstances that delayed progress.  
We did not meet our target in landfill waste due to plant expansion and extensive retooling packaging from new equipment for new model programs.

## Initiative #3

Category 3: <u>Water</u>	Baseline	Current	Cost Savings
Indicator 3: _____	(indicate measurement unit)	(indicate measurement unit)	
Calendar year	2019	2019	
Actual quantity (per year)	15524	15028	\$1602.08
Production unit (select one)	Earned Labor Hours Other -- specify (e.g. Gallons, length, etc.)	Production units	Production lbs.
Production Quantity	1142	1218	NA
Normalization factor (Current year production ÷ Baseline year production) 1.07			
Normalized quantity (Actual current year quantity - Actual baseline quantity) x Normalization factor 81.32			

Briefly describe *how* you achieved improvements for environmental initiative #3 or, if relevant, any circumstances that delayed progress.  
Auto flush toilets, Auto sink faucets, Water misters installed on sink faucets to reduce water usage, cooling towers water consumption monitored and adjusted.

1. Briefly describe the *impacts or wastes* eliminated resulting from the environmental initiative(s). If multiple initiatives, please indicate which specifically.

2. Are there other best management practices (BMPs) you can share correlating to your initiative(s)?

Water misters on faucets greatly reduce water consumed with hand washing.

3. If the objectives and targets associated with the environmental improvement initiative(s) were not attained, please verify continued progress toward the environmental initiative(s). If multiple initiatives, please indicate which specifically.

Waste targets were not met in 2019 due to plant expansion, remodeling and new equipment packaging. FY20 waste reduction plans under investigation.

4. Please provide a narrative summary of progress made toward *qualitative, significant* EMS objectives and targets, if any.

5. Please list any state, U.S. EPA, or other partnership programs to which you are reporting this data (e.g., Energy Star, Project XL).

6. Is your entity willing to share the environmental improvement initiative(s) and its best management practices (BMPs) at the ESP Annual Meeting and/or a Partners for Pollution Prevention quarterly meeting or conference? ☒ Yes ☐ No

## SECTION F

## ENVIRONMENTAL IMPROVEMENT INITIATIVE

## Why do we need this information?

Facilities need to show they are committed to improving their environmental performance.

## What do you need to do?

Refer to the Environmental Performance Table and answer the following questions.

1. Select the appropriate boxes in the following table to indicate the **category** and **indicator(s)** that represents the next environmental improvement initiative selected by your facility. For the category and indicator selected, list the **baseline year** (e.g., 2015) and the **future year** (e.g., 2016). Next, list the **baseline annual quantity** (e.g., 5 tons) and **future annual quantity** (e.g., 2 tons) you are committing to achieve by the end of the future year.

Category	Indicator	Baseline Year 20 <sup>19</sup>	Future Year 20 <sup>20</sup>	Unit
<input type="checkbox"/> Material Procurement	<input type="checkbox"/> Recycled content			Pounds, tons
	<input type="checkbox"/> Hazardous/toxic components			Pounds, tons
<input type="checkbox"/> Suppliers' Environmental Performance	<input type="checkbox"/> Specify indicator: _____			As specified for the particular indicator
<input type="checkbox"/> Material Use	<input type="checkbox"/> Materials used			Pounds, tons
	<input type="checkbox"/> Hazardous materials used			Pounds, tons
	<input type="checkbox"/> Ozone depleting substances used			CFC-11 equivalent pounds
	<input type="checkbox"/> Total packaging materials used			Pounds, tons
<input checked="" type="checkbox"/> Water Use	<input checked="" type="checkbox"/> Total water used	15028 m3	14226 m3	Gallons
<input type="checkbox"/> Energy Use	<input type="checkbox"/> Electricity			kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Steam			kWh / MWh, gallons, ft <sup>3</sup>
	<input type="checkbox"/> Natural gas			Btu / MMBtu
	<input type="checkbox"/> Diesel			Gallons
	<input type="checkbox"/> Propane / LPG			Btu / MMBtu, gallons
	<input type="checkbox"/> Gasoline			Gallons
	<input type="checkbox"/> Solar			kWh / MWh
	<input type="checkbox"/> Wind			kWh / MWh
	<input type="checkbox"/> Landfill gas			Btu / MMBtu
	<input type="checkbox"/> Combined heat and power			kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Other: _____			_____
<input type="checkbox"/> Land and Habitat	<input type="checkbox"/> Land and habitat conservation			Square feet, acres
	<input type="checkbox"/> Community land revitalization			Square feet, acres
<input checked="" type="checkbox"/> Air Emissions	<input checked="" type="checkbox"/> Total GHGs	12137	15197	MTCO <sub>2</sub> E
	<input type="checkbox"/> VOCs		Note: due to production increase	Pounds, tons
	<input type="checkbox"/> NO <sub>x</sub> , SO <sub>x</sub> , PM <sub>2.5</sub> , PM <sub>10</sub> , or CO			Pounds, tons
	<input type="checkbox"/> Air toxics			Pounds, tons
	<input type="checkbox"/> Odor			European Odour Units
	<input type="checkbox"/> Radiation			Curies, Becquerels
	<input type="checkbox"/> Dust			Pounds, tons
<input type="checkbox"/> Discharges to Water	<input type="checkbox"/> COD or BOD			Pounds, tons
	<input type="checkbox"/> Toxics			Pounds, tons
	<input type="checkbox"/> Total suspended solids			Pounds, tons
	<input type="checkbox"/> Nutrients			Pounds, tons of N or P
	<input type="checkbox"/> Sediment from runoff			Pounds, tons
	<input type="checkbox"/> Pathogens			MPN/ml, CFU/ml
<input checked="" type="checkbox"/> Non-hazardous Waste	<input checked="" type="checkbox"/> Landfill	437 Tons	619 Tons	Pounds, tons
<input type="checkbox"/> Hazardous Waste	<input type="checkbox"/> Incineration		Note: Due to production increase	Pounds, tons
	<input type="checkbox"/> Reused/recycled off-site			Pounds, tons, gallons
	<input type="checkbox"/> Other: _____			Pounds, tons, gallons
<input type="checkbox"/> Noise	<input type="checkbox"/> Noise			dBA
<input type="checkbox"/> Vibration	<input type="checkbox"/> Vibration			Inches per second
<input type="checkbox"/> Products	<input type="checkbox"/> Expected lifetime energy use			kWh / MWh, Btu / MMBtu
	<input type="checkbox"/> Expected lifetime water use			Gallons
	<input type="checkbox"/> Expected lifetime waste to air, water, or land from product use			Pounds, tons
	<input type="checkbox"/> Waste to air, water, or land from disposal or recovery			Pounds, tons

If you need assistance filling out the form, please contact the ESP program manager at either [esp@idem.in.gov](mailto:esp@idem.in.gov) or 1-(800) 988-7901.

## SECTION F

## FUTURE YEAR ENVIRONMENTAL IMPROVEMENT INITIATIVE

## CONTINUED

2. If the environmental improvement initiative(s) will be *qualitative* in nature, please describe. \_\_\_\_\_

Note: Increased production of vehicle seats increase from 144236 to 199978. We also added new process of seat rails with a build plan of 219,726 sets, that is reason for increase in Air emissions and Waste. Continued effort will be made to reduce these values in future.

3. What activities or process changes do you plan to undertake at your facility to accomplish your initiative (e.g., technology changes in a particular process line, employee training)? \_\_\_\_\_

HVAC efficiency upgrade as units need replacement, Enhance recycle program, installation of waterless urinals

4. Does this initiative address a significant aspect in your EMS?

☒ Yes

☐ No—If no, please explain why you believe this indicator should be included as an environmental improvement initiative: \_\_\_\_\_

## CERTIFICATION AND PLEDGE

On behalf of (name of facility) TOYOTA BOSHOKU INDIANA

I certify that the information contained in this Annual Performance Report and attachments is accurate to the best of my knowledge and that this facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with all applicable federal, state, and local environmental requirements, or has a corrective action program in place to attain compliance.

We, TOYOTA BOSHOKU INDIANA, commit to maintaining the principles and goals outlined in our Environmental Management System for our facility's Indiana Environmental Stewardship Program status. We agree to strive for full compliance with all regulations promulgated by the U.S. EPA, state, or local jurisdictions. We agree to promote the Indiana Environmental Stewardship Program and to share our success stories with other facilities. We understand that we must meet the requirement of implementing one (1) new, independent environmental improvement initiative each year of membership (for a total of four (4) initiatives), that the Annual Performance Report must be submitted to IDEM by April 1<sup>st</sup> of each year, and that we must reapply to the Indiana Environmental Stewardship Program every four (4) years.

I understand that the information provided in this Annual Performance Report will be public record. I am the senior facility manager or authorized facility signatory, and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is submitting this Annual Performance Report.

Signature

Date (month, day, year)

4/27/2020

Printed signature

Philip W. Avey

Title

EHS MANAGER



## NSF International Strategic Registrations Audit Report

### **Toyota Boshoku Indiana (TBIN)**

1698 S 100W

Princeton, Indiana 47670 USA

**C0143146**

### **Audit Type**

Surveillance Audit

### **Auditor**

Mark Gostomski

### **Standard**

ISO 14001:2015

(Exp Date: 13-AUG-2021)

### **Audit Date(s):**

08/05/2019 - 08/07/2019

### **Recommendation**

ISO 14001:2015 : Surveillance: Complete No change to certificate



## Executive Summary

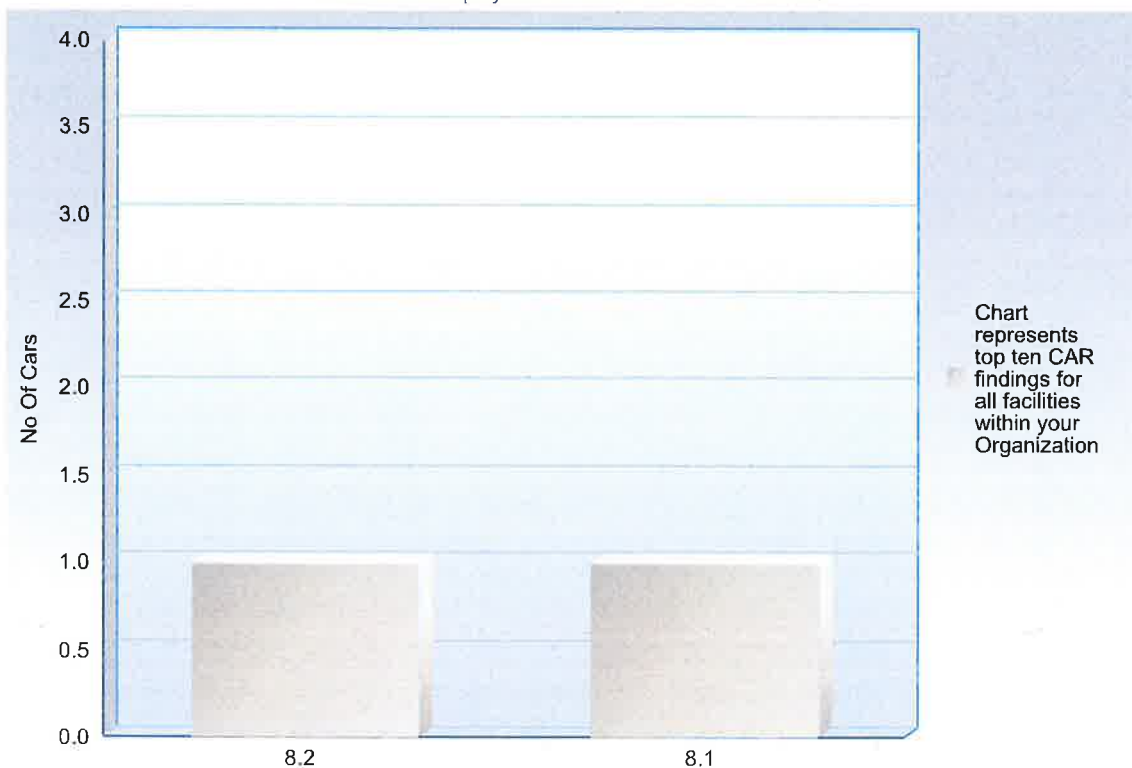
ISO 14001:2015

This surveillance audit was based on sampling of the organization's processes and available documented information. The Audit verified that the scope of registration is accurate and reflects the products and services of the organization. The organization continues to maintain a generally effective EMS, and a commitment to pollution prevention. Noted improvement in housekeeping and outdoor grounds. Identified zero non-conformities during this surveillance audit. As a reminder, the audit was and is always a sampling of the environmental management system, as there may be existing non-conformities that were not observed during the audit.

The identified significant aspects are reasonable for the customer's industry sector. Environmental goals set by the organization are moving forward, exhibiting the company's commitment to continual improvement.

The internal audit process is well implemented and the Registrar can rely on its effectiveness. I would like to congratulate the organization and systems team on their commitment, and again thank them for the outstanding hospitality and cooperation given to me during the audit.

Top 10 Non Compliant Standard Clauses  
CAR Chart Displays Current and Previous Years Data



Toyota Boshoku America, Inc.

## Standard Clause Description

8.2 Emergency management and response

8.1 Operational planning and control

## Opportunities

ISO 14001:2015

Opportunities were verbally stated throughout the audit.

## Corrective Action Requests

There is NO Corrective Action Request in this audit.





### **Site Information**

The audit was based on a sampling of the company's management system.

### **Industry Codes**

NACE:DH 25.2, NACE:DJ 28.4, NACE:DJ 28.7, NACE:DM 34.3

### **Scope of Registration**

**ISO 14001:2015** : The environmental management system is applicable to the management of the environmental aspects related to:

The assembly of automotive seats and door panels, and automotive interior components.



## Opportunities for Improvements

### Processes

#### ISO 14001:2015

Process Name	Observations / Auditor Notes
7: Process Activities-06	<p><b>Describe whether the process is effective or not (effectiveness should be supported with specific data/results). Include strengths &amp; weaknesses of system:</b></p> <p>The goal of this process is to ensure the commitment to the prevention of pollution and regulatory compliance is attained during the production operation(s) at the facility.; Interviewed personnel were asked about spills or leaks from equipment, and they responded well. They were aware of the EMS policy, and what it means to them. They were aware of the significant aspects in their work area and how they function to control or prevent a possible impact or regulatory violation. All interviewed staff did well. Personnel were aware of responsibilities and chain of command for EMS related issues. Emergency planning has been communicated. EMS communications received from management regularly. Observed exceptional housekeeping. Documents required for operational control were available. Training is effective based on audit responses.</p> <p>Interviewed Staff: 1st Shift: Welder (x3), Shift Supervisor (x1), Maintenance (x4), Assembly (x2), Shipping and Receiving (x2), Injection Mold Operator (x2), Foam (x2)</p> <p>2nd Shift: Welder (x2), Shift Supervisor (x1), Maintenance (x4), Assembly (x2), Shipping and Receiving (x2), Injection Mold Operator (x2), Foam (x2)</p>
EMS & TOP MANAGEMENT FUNCTIONS	<p><b>Describe whether the process is effective or not (effectiveness should be supported with specific data/results). Include strengths &amp; weaknesses of system:</b></p> <p>The goal of this process is to ensure that the EMS is implemented, maintained and effective throughout the facility, and that top management is engaged in the success or failure of the EMS.; MANAGEMENT REVIEW is conducted monthly. April is the beginning of the organization's fiscal year and the April Management Review covers the EMS of the full previous year (April 2018 through March 2019). The EHS Manager is in charge of putting together a power point for each management review. A management review was conducted on 4/16/2019 for the previous fiscal year (April 2018 through March 2019). A sign in sheet was provided showing that Top Management attended the management review. The monthly management reviews were shown to cover Environmental Key Performance Indicators (environmental objectives), Environmental Aspect Review, and ISO 14001:2015 requirements.</p> <p>Outcomes from management review could be seen. Process remains effective.</p> <p>Documents reviewed: -Management Review – April, 2019 (covers fiscal year from April 2018 to March 2019) -Management Review – May, 2019 -Management Review – June, 2019 -Management Review – July, 2019</p> <p>The process of EMS COMPETENCE, TRAINING and AWARENESS is effective based on interviews, documents and records. The organization provides general environmental awareness training during orientation. The organization maintains a training center referred to as the Do Jo. Competence training ensures that employees are qualified to safely carry out their assigned tasks. During orientation employees are introduced to a verity of training, all training involves some form of testing to show competence in the subject. Training records and proof of special qualifications are kept on file in the respective departments. For example the Maintenance Department will keep records for Arc Flash and HAZWOPER training of their Team Members. Training sessions for the EMS are conducted by the Environmental Health and Safety Manager and includes: Waste Management, Liquid Waste Management, Diesel Fuel Generator Refueling Procedure,</p>



Process Name	Observations / Auditor Notes
	<p>Spent lamps work instructions, Emergency Spill response procedure, TDI Spill response, Bulk Isocyanate transfer. Training records were confirmed with the Human Resources Department for select interviewed personnel. Human Resources maintains training records for all employees that go through orientation. Once employees are on the manufacturing floor they are shadowed trained. Once the employee is competent in completing the task the Group Leader will sign off of the training log. The log will be kept on file in the manufacturing area. Training is effective based on audit responses.</p> <p>Documents Reviewed:</p> <p>Training Matrix  3-27-19 Emergency Response Plan Training (1st and 2nd Shifts)  7-22-2019 Spill Training Log (2nd Shift)  7-16-2019 Spill Training Log (1st Shift)  5-30-2019 Isocyanate Program – Emergency Spill Response  5-30-2019 Waste Management, Liquid Waste Handling  5-30-2019 Spent Lamps  5-30-2019 TDI Spill Response</p> <p>INTERNAL COMMUNICATION is documented in the Environmental Management System Manual IN-EN-ENV491-MN-E. Information about the environmental management system is made available through the in house Email newsletter, the display screens in the cafeteria, communication meetings and various posting throughout the facility. All employee meetings are held monthly that include environmental as well as safety and quality topics. Employees are given cards that are attached to their badges that include the environmental policy and the 2019 Objectives and Targets. There is good communication between management and employees. Knowledge was exhibited in regard to relevant operational control and responsibility, as well as record keeping. Key information is posted throughout plant. Communication is good. Required documentation was available, controlled and current.</p> <p>Documents reviewed:  EMS Manual – Section 7.4 (IN-ENV-ENC491-MN-E, Rev 4)  2019 EMS Employee Cards  IN-EN-ENV558-WI-E – Internal Communication of Environmental Issues</p>
EMS & TOP MANAGEMENT FUNCTIONS	<p><b>Describe whether the process is effective or not (effectiveness should be supported with specific data/results). Include strengths &amp; weaknesses of system:</b></p> <p>The goal of this process is to ensure that the EMS is implemented, maintained and effective throughout the facility, and that top management is engaged in the success or failure of the EMS.; There has been no changes to the SCOPE since the last audit. The scope of the EMS covers the manufacturing of interior automotive parts, including injection molding, door panels (trim), seat assemblies including seat assembly, frame welding, stamping, urethane cushion manufacturing, and the shipping and receiving of materials.</p> <p>CONTEXT of the organization is addressed in the EMS manual. The organization lists both INTERNAL and EXTERNAL ISSUES includes Air Quality, Water Quality, Land use, Existing Contamination, Natural resources and their depletion. Interested parties are identified as customers and members of the public seeking information relating to environmental management capability within the organization, new and existing Team Members as well as Regulators and Investors.</p> <p>There has been no change to the ENVIRONMENTAL POLICY (Section 5.2) since the last audit. The policy remains suitable to the organization and its operations. It provides a framework for setting up objectives, meeting its compliance obligations, preventing pollution, and to continuously improve.</p> <p>Documents reviewed:</p> <p>-EMS Manual – Section 5.2 (IN-ENV-ENC491-MN-E, Rev 4)  -IN-EN-ENV493-SD-E: Environmental Policy, Rev 6</p> <p>Reviewed current ROLES AND RESPONSIBILITIES (Section 5.3). EMS roles and responsibilities were last updated on 7/1/2019 to reflect current management. The organization has developed an EMS Ongoing Responsibility Matrix Form. The matrix lists</p>



Process Name	Observations / Auditor Notes
	<p>tasks required to maintain an effective EMS and the position responsible to lead and support those tasks.</p> <p>Documents reviewed:</p> <ul style="list-style-type: none"> <li>-EMS Manual – Section 5.3 (IN-ENV-ENC491-MN-E, Rev 4)</li> <li>-EMS Ongoing Responsibility Matrix Form</li> <li>-TBIN EMS Organizational Chart</li> </ul> <p>ENVIRONMENTAL ASPECTS are identified following procedure IN-EN-ENV537-PR-E – Identifying Environmental Aspects. The organization has developed an Environmental Aspects and Impacts Evaluation Form (IN-EN-ENV495-FM-E). This form looks at each department (urethane, welding, seats, doors, receiving, shipping, TDI, office-janitor-outside, CO2) and evaluates the environmental aspects within them. Form IN-EN-ENV498-SD-E Environmental Summary List is used to identify regulatory permitting requirements for each aspect. The aspects are then listed in IN-EN-ENV605-SP-E. This form is used to evaluate each aspect using the established criteria. Based on the criteria, a significant aspect is any aspect with a score of 24 or greater. The organization has identified three significant aspects; CO2 Emissions, TDI, and Toluene. Process is effective.</p> <p>Documents Reviewed:</p> <ul style="list-style-type: none"> <li>-EMS Manual – Section 6.1.2 (IN-ENV-ENC491-MN-E, Rev 4)</li> <li>-IN-EN-ENV537-PR-E – Identifying Environmental Aspects</li> <li>-IN-EN-ENV495-FM-E – Environmental Aspects and Impacts Evaluation Form</li> <li>-IN-EN-ENV497-SD-E – Appendix B, Environmental Aspects Summary List</li> <li>-IN-EN-ENV605-SP-E – Environmental Aspects Significance Worksheet (Rev 3)</li> </ul>
EMS & TOP MANAGEMENT FUNCTIONS	<p><b>Describe whether the process is effective or not (effectiveness should be supported with specific data/results). Include strengths &amp; weaknesses of system:</b></p> <p>The goal of this process is to ensure that the EMS is implemented, maintained and effective throughout the facility, and that top management is engaged in the success or failure of the EMS.; Reviewed the 2018 ENVIRONMENTAL OBJECTIVES; 1) CO2 reduction by 2%, 2) water usage reduction by 1%, and 3) waste reduction by 1%. The target for CO2 was to be at or below 12,593 tons and the actual CO2 emissions for the year were 12,224 tons. The target for water usage was to be at or below 18,191 m3 and the actual for the year was 14,463 m3. The target waste reduction was to be at or below 363 tons and the actual for the year was 335 tons. All 2018 objectives were met. The 2019 objectives are to continue to reduce CO2 by 2%, water usage by 1%, and waste reduction by 1%. The annual targets for each are: CO2: 13,071 tons, water: 15,524 m3, waste: 326 tons. Actions towards achieving each objective are tracked using the KPI forms. Actions to reduce CO2 are to continue to install LED and motion sensor lighting, linking the plant air compressor systems, and installing more efficient air compressor systems. Actions to reduce water usage include identifying and fixing all water leaks, adjusting float level on cooling towers, install automatic flushers on toilets and automatic sinks in restrooms, and add misting faucets in west bathrooms for 70-80% water saving from hand washing. Actions to reduce waste include working with recycling vendors to get proposals to further reduce landfill waste. Process is effective.</p> <p>Documents reviewed:</p> <ul style="list-style-type: none"> <li>-EMS Manual – Section 6.2.1/6.2.2 (IN-ENV-ENC491-MN-E, Rev 4)</li> <li>-E_30_3050_00000_TBIN_00 – Report of Environmental Data</li> </ul> <p>Reviewed the procedure for EVALUATING COMPLIANCE (IN-EN-ENV530-PR-E). Identified COMPLIANCE OBLIGATIONS are found in the Compliance Obligations form (IN-EN-ENV501-SD-E). The form identifies the facility's applicable compliance obligations, the activity to which it applies, and source used to track changes. Every year the company develops a compliance calendar (IN-EN-ENV587-FM-E) to track what comes due every month. When an item is completed, it is checked off on the calendar. Compliance audits are continuing to be done annually. The last compliance audit was completed on November 6th, 218 by TBA. During the audit, 5 observations were made. All observations were shown to be closed out within 30 days (company requirement) of the finding.</p> <p>The facility is required to track and report its emissions as part of their applicable air permit. Emissions are tracked using the TBIN Emissions Report (2019) that is completed and submitted to the state every year.</p>



Process Name	Observations / Auditor Notes
	<p>The facility has a no exposure permit for storm water. The permit will expire on July 1st, 2020 for the east plant and June 15, 2021 for the west plant.</p> <p>Process remains effective.</p> <p>Documents reviewed:            -TBIN Emissions Report 2019            -Spill Control and Countermeasure Plan (Rev 8/14/2017)            -IN-EN-ENV519-PR-E – Compliance Obligations            -TBIN – Environmental Compliance Audit Report            -IN-EN-ENV501-SD-E – Compliance Obligations            -IN-EN-ENV512-SD-E – Environmental Retention Log            -IN-EN-ENV530-PR-E – Evaluation of Compliance            -IN-EN-ENV-587-FM-E – Compliance Calendar</p> <p>There is system in place for COMMUNICATION with EXTERNAL parties (IN-EN-ENV557-WI-E). The organization has developed an environmental communications log (IN-EN-ENV485-FM-E) to track external communications on the EMS. Examples of items to be logged include: 1) Regulatory Agency Requests or Complaints, 2) Environmental Interest Group Requests or Complaints, 3) Customer Requests or Complaints, 4) Neighbors or Local Residents Requests or Complaints, 5) Suppliers Requests or Complaints, 6) and Local Government or Official's Requests or Complaints. The EMS Coordinator is responsible for verifying the nature of each request. Reviewed IN-EN-ENV485-FM-E. There have been no external communications since the last audit. The last entry was on 4/14/2018. Process is effective.</p> <p>Documents reviewed:            -EMS Manual – Section 7.4 (IN-ENV-ENC491-MN-E, Rev 4)            -IN-EN-ENV557-WI-E External Communication of Environmental Issues            -IN-EN-ENV485-FM-E Appendix A, Environmental Communication Log</p>
EMS & TOP MANAGEMENT FUNCTIONS	<p><b>Describe whether the process is effective or not (effectiveness should be supported with specific data/results). Include strengths &amp; weaknesses of system:</b></p> <p>The goal of this process is to ensure that the EMS is implemented, maintained and effective throughout the facility, and that top management is engaged in the success or failure of the EMS.; Reviewed procedure IN-EN-ENV527-PR-E – Emergency Preparedness and Response. The organization has identified potential emergencies to be: 1) fire or explosion, 2) gas leaks or spills, 3) natural disasters, 4) tank, dam or equipment structural failure, 5) electrical power cut or gas cut, 6) crash or collision, and 7) sabotage, vandalism, terrorist attack, riot, bomb threat, hostage incident.</p> <p>To prepare for these emergencies, the organization has developed an Emergency Action Plan &amp; Preparedness (IN-EN-ENV614-PR-E). Staff are trained on emergency response actions. Drills are also conducted for spills, fires, and sever weather.</p> <p>Reviewed the following drills:            4-4-2019 Take Cover (1st and 2nd shift)            7-22-2019 Spill Training Log (2nd Shift)            7-16-2019 Spill Training Log (1st Shift)</p> <p>The facility is keeping track of its spills using the Environmental Incident Report (PR-EN-FM-44-006). The last spill happened on 8/23/2018. An Environmental Incident Report was filled out for it. The spill was approximately 250 gallons of hydraulic oil that did not reach the outside or storm drain.</p> <p>Documents reviewed:            IN-EN-ENV527-PR-E – Emergency Preparedness and Response            IN-EN-ENV614-PR-E – Emergency Action Plan &amp; Preparedness            EMS Manual – Section 8.2 (IN-ENV-ENC491-MN-E, Rev 4)            Training Log – SPCC Training &amp; Drill, DOT, GHS, TDI Spill Response &amp; Drill, and HAZCOM</p> <p>INTERNAL AUDITS are broken down by clause and are scheduled throughout the year. Each year an audit schedule is developed. The organization has their own internal</p>





Process Name	Observations / Auditor Notes
	<p>auditors. The internal auditors use an Internal Audit Checklist (IN-EN-ENV585-FM_E) when conducting their audits. The checklist lists each clause and requirements to audit to. Process is being followed. Reviewed 2018 internal audits. There was one finding from the 2018 internal audits that has been closed out. In 2019 there have been three findings from internal audits (See Nonconformance and Corrective Actions). Internal auditors seemed competent and were able to show their certifications. Process remains effective.</p> <p>Documents reviewed:          -IN-EN-ENV584-FM-E Template (internal audit schedule)          -IN-EN-ENV533-PR-E Internal Audit          -6/1/2018 Raw Materials Approval          -7/20/2019 TDI Waste Drum Spill          -7/22/2019 HAZWOPER Training Incomplete          -7/22/2019 SCBA Inspections Incomplete</p> <p>DOCUMENT CONTROL AND RECORDKEEPING management process was found to be effective. Policy Tech software is used to manage all document control and recordkeeping. The Manual IN.EN.ENV.491.MN.E, specifies requirement for an Environmental Management System for the Toyota Boshoku Indiana (TBN) Facility, applied at its Princeton, Indiana facility. The organization has divided controlled documents into four categories: Level One – EMS Manuals, Level Two – Environmental System Procedures, Level Three – Work Instructions, Level Four – Forms and Records. The organization keeps a master list of EMS documents. All reviewed documents were seen to be controlled with a title, document number, revision level, and revision date. Process remains effective.</p> <p>Documents reviewed:          EMS Manual – Section 7.5 (IN-ENV-ENC491-MN-E, Rev 4)          IN-EN-ENV525-PR-E Documentation</p> <p>The two CARs from the previous audit were shown to be closed out. For T1981124-1 the organization has conducted spill training including a spill drill. Training and drill records were provided. Interviewed staff were able to clearly explain their roles in the the event of a spill. CAR effectively closed out. For T1981124-2, the environmental policy and EMS requirements were seen added to the visitor/contractor check in screen. Visitors/contractors are required to scroll down the document and review it prior to signing in. CAR effectively closed out.</p> <p>Documents reviewed:          IN-EN-ENV531-PR-E Nonconformity, Corrective and Preventative Action          IN-EN-ENV514-FM-E Environmental Corrective Action Log</p>
EMS & TOP MANAGEMENT FUNCTIONS	<p><b>Describe whether the process is effective or not (effectiveness should be supported with specific data/results). Include strengths &amp; weaknesses of system:</b></p> <p>The goal of this process is to ensure that the EMS is implemented, maintained and effective throughout the facility, and that top management is engaged in the success or failure of the EMS.; Reviewed procedure for OPERATIONAL CONTROL (IN-EN-ENV526-PR-E). The organization uses the following methods for operational controls: Documented Procedures (Control Plans, Work Instructions, Visual Aids, Control of Use of Gages), Cleanliness of Premises (sort, set in order, shine, standardize, sustain), Contingency Plans, Maintenance System, Process Monitoring, and Maintaining Process Monitoring Control. Operational Control documents are located on the intranet (Policy Tech) where employees have access to them.</p> <p>Engineered controls include; Spill pallets for all chemicals, no outside storage of chemicals, ISO tanks have level alarms on them, dust collectors for urethane dust, floor trenches for chemical storage areas, and secondary containment for aboveground storage tanks. All engineered controls were viewed to be in good working condition and inspected on a regular basis.</p> <p>The facility has some control over the design of the seats. When designing the seats, the facility keeps life cycle perspective in mind. All seats are built with recyclable materials.</p> <p>Visitors including contractors and vendors must sign into the front desk prior to entering the site. As part of the sign in process, visitors are required to read and sign off on the visitor information page. This page explains the requirements for bringing chemicals into the facility, what to do in case of an emergency (fire, severe weather, spills), their responsibilities when handling materials on site, and the environmental policy.</p>



Process Name	Observations / Auditor Notes
	<p>Every year the facility has a shutdown period where outside contractors come in and perform work. Before work begins, the organization performs contractor safety and environmental awareness training. The last training for shutdown was conducted on 7/12/2019 for all contractors performing work onsite. Signature of contractors were able to be shown.</p> <p>Documents reviewed:</p> <ul style="list-style-type: none"> <li>-EMS Manual – Section 8.0 (IN-ENV-ENC491-MN-E, Rev 4)</li> <li>-IN-EN-ENV526-PR-E – Operational Control</li> <li>-IN-EN-ENV551-WI-E – Emergency Plan of Action</li> <li>-IN-EN-ENV546-WI-E – Indiana Spill Reporting</li> <li>-IN-EN-ENV540-WI-E – Spent Lamp Work Instructions</li> <li>-IN-EN-ENV564-WI-E – Liquid Waste Handling</li> <li>-IN-EN-ENV556-WI-E – Waste Management Procedure</li> <li>-IN-EN-ENV563-WI-E – Air Emissions Report Instructions</li> <li>-IN-EN-ENV569-PR-E – Diesel Fuel Generator Refuel Procedure</li> </ul> <p>MONITORING and MEASURING is performed by tracking Key Performance Indicators (KPIs) that were set by TBJ. TBJ sends out KPIs for each individual TB facility. KPIs that are required to be tracked are CO2, waste to landfill, and water usage. Each month the EMS Coordinator fills out and submits KPI reports to show how the facility is performing and whether or not it is on track to meeting its KPI goals. If the facility is failing to meet the KPI goal then they must go through an evaluation process to identify why they are not achieving their goals and steps to take to correct the issue and get them back on track.</p> <p>In addition to KPI's the facility tracks usage of weld wire, mold release, natural gas usage, isopropyl alcohol, carbrite gel, emergency equipment fuel usage, injection molding chemical usage, regrind, etc. for air emission reporting.</p> <p>Weekly storm water inspections are conducted. The inspector fills out the TBIN West / East Site No Exposure / Storm Water Inspection Form (IN-EN-ENV488-FM-E). SPCC inspections are conducted as part of weekly PM's for maintenance.</p> <p>Weekly TBIN RECRA Weekly Inspection Form (IN-EN-ENV487-FM-E) are filled out for all waste storage areas.</p> <p>The facility has not monitoring/measuring equipment that requires calibration. Process remains effective.</p> <p>Documents reviewed:</p> <ul style="list-style-type: none"> <li>-IN-EN-ENV487-FM-E - TBIN RECRA Weekly Inspection Form</li> <li>-IN-EN-ENV488-FM-E - TBIN West / East Site No Exposure / Storm Water Inspection Form</li> <li>-KPI Tracking Forms</li> </ul>

### Verification of CARs For ISO 14001:2015

**Have you verified the effectiveness of all previous CARs? (List all new CAR's that you initiated in this report because you did not verify effective implementation of a previous CAR)**

Yes.

#### **Discuss your evaluation in detail.**

The two CARs from the previous audit were shown to be closed out. For T1981124-1 the organization has conducted spill training including a spill drill. Training and drill records were provided. Interviewed staff were able to clearly explain their roles in the the event of a spill. CAR effectively closed out. For T1981124-2, the environmental policy and EMS requirements were seen added to the visitor/contractor check in screen. Visitors/contractors are required to scroll



down the document and review it prior to signing in. CAR effectively closed out. .