THOR INDUSTRIES INC
ENVIRONMENTAL MANAGEMENT SYSTEM (EMS) MANUAL

6/04/2020
Revision 1.0

Prepared By: ___________________________________________
(EMS Champion)

Approved and Authorized By: _____________________________
(President)
THOR Industries Environmental Policy

(Applicable to THOR companies based in the U.S.)

Purpose

Enjoying the outdoors in the company of friends and family is essential to our business at THOR Industries, (“THOR” and “we”). We are committed to protecting our environment as we serve our customers and as our business grows. We believe that the RV industry is an influential part of today’s world and through our growth we’ve connected people to each other and brought them into the outdoors. We believe reducing waste and emissions, minimizing environmental impact, and promoting conservation at all of our locations promotes the long-term health of the company while making the world a better place for all.

Policy

THOR recognizes the importance of environmental protection and will comply with all environmental legislation, regulations and appropriate codes of practice relating to the processes and activities of the company. THOR is committed to carrying out all reasonable measures to continually improve its environmental performance. We aim to:

- Efficiently use materials and resources in our facilities, products and processes;
- Reduce the amount of waste produced;
- Research replacement options for the use of hazardous materials;
- Reduce consumption of raw materials, water and fuel;
- Continuously improve our environmental performance with sharing best practices across THOR subsidiaries;
- Assess environmental impacts when developing new products and when evaluating logistics and distribution of products;
- Consider environmental performance when selecting and evaluating suppliers;
- Assess company facilities and report results to senior leadership;
- Conduct environmental due diligence as part of any merger or acquisition.

Responsibility

THOR fosters environmental awareness and understanding in all employees, suppliers, customers and other stakeholders. The Board of Directors shall have responsibility for this Environmental Policy.

Revised October 18, 2019
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<td>EMS 20A:</td>
<td>Chemical change form</td>
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01. Organizational chart:
# EMS Manual Revisions

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<th>Description</th>
<th>Sections Affected</th>
<th>Revised By (initial)</th>
<th>Approved By (Initial)</th>
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</table>
1.0 Purpose of This Manual

In order to improve upon the environmental performance of THOR Industries Inc. an environmental management system (EMS) has been implemented. This EMS manual defines the scope of the THOR Industries Inc. EMS.

The Principal elements of the EMS described in this manual are:

- Reporting Procedures
- Spill Prevention
- PCP Management
- Asbestos Management
- Waste Handling and Waste Minimization
- Community Right to Know Planning
- Environmental Training
- Container Management
- Relation with Regulatory Agencies
- Underground Storage Tank management
- Retention of Environmental Records
- Pollution Prevention
- Air Emissions Management
- Waste water Management
- Environmental management of real estate planning
- Inactive, closed and divested sites
- Regulation Tracking
- Product life cycle design guideline
- Toxic substances control Act
- Chemical Change Procedure
- Chemical change request form

The EMS provides a mechanism for environmental management throughout all functional areas of our company. The EMS is designed to cover environmental issues that a facility can control and directly manage as well as issues it does not control or directly manage but can be expected to influence.

The manual will be controlled by the EMS Champion. This individual will be responsible for maintaining an up-to-date manual that includes all revisions and modifications. The EMS Champion is also responsible for ensuring that all applicable subsidiaries receive copies of this document and subsequent revision.
THOR INDUSTRIES INC

ENVIRONMENTAL PROCEDURE EMS 01
ENVIRONMENTAL REPORTING

BACKGROUND

The U.S. Environmental Protection Agency (EPA), states, and local authorities regulate industrial facilities in the United States. Environment Canada, provinces, and municipal governments regulate industrial facilities in Canada.

U.S. and Canadian environmental laws and regulations give broad authority to regulatory agencies to issue construction and operating permits, conduct inspections, and take enforcement actions as needed. These laws and regulations also impose specific obligations on owners and operators of industrial facilities, including the reporting of spills, emission excursions, discovery of old disposal sites, etc.

THOR Industries expects the plant or facility manager or the environmental coordinator of each operating facility to do the following to manage risks and minimize environmental liabilities:

- Comply with applicable environmental requirements.
- Use good operating practices, beyond strict regulatory compliance.
- Communicate regularly with Corporate Environmental Affairs to provide environmental status, seek advice, and obtain regulatory updates.

This Procedure addresses two types of environmental reporting: 1) communication between operating facilities and Corporate staff and 2) spill and incident reporting.

GUIDANCE PLAN

Communication with Corporate Staff

1. Each THOR Industries facility shall provide the Corporate Environmental Affairs office with information concerning environmental matters at the plant, as soon as they occur. Examples of environmental matters of concern include, but are not limited to, the following:

   a. Notice of Violation (NOV), citations, environmental actions, or complaints from regulatory agencies or citizen groups.
   b. Regulatory agency visits or inspections and findings shared with plant management.
   c. Plant's discovery of potential violations of existing permits (e.g., self-monitoring reports, expired permits, etc.).
   d. Plant's discovery of any old waste disposal areas on sites.
e. Spills of products or waste materials that are reportable to regulatory agencies or could impact the environment, especially surface water, groundwater, or air.

2. Each THOR Industries facility shall advise the Corporate Environmental Affairs office or the Corporate Legal Department prior to reporting items c & d to the appropriate regulatory agency.

3. For spills of products or waste materials that are determined to be reportable, each THOR Industries facility shall report to the regulatory agency according to applicable requirements, and advise the Corporate Environmental Affairs office and the Corporate Legal Department immediately thereafter.

**Spill Response Procedures**

1. Each THOR Industries facility should take the following major steps after a spill:
   a. Secure area.
   b. Control and contain spill, if appropriate.
   c. Evacuate area; remove ignition sources, if appropriate.
   d. Provide medical attention, if needed
   e. Alert General Manager, Maintenance manager, Environmental and Communication personnel.
   f. Collect and arrange for disposal of spilled material.
   g. Notify Corporate Environmental, Health & Safety, and Communications personnel.

2. The duties of the respective personnel responsible for addressing spills are as follows:
   a. Plant Manager of area where spill occurred (where applicable):
      · Identify spilled material. Take immediate action to stop or contain spill.
      · Notify General Manager, Environmental, and Communications personnel. Refer to Plant's Spill Prevention Control and Countermeasures Plan (SPCC) and/or the Plant's Contingency Plan for names and work and home phone numbers of appropriate personnel to be contacted. The names and phone numbers of these emergency contact persons should be provided to all foremen and group leaders.
      · Secure area. If exposure to toxic materials is likely, evacuate unprotected personnel; if material is flammable, eliminate ignition sources.
   b. Plant Safety or environmental personnel (where applicable)
      · Arrange for medical care of affected employees. Provide copies of the Material Safety Data Sheets (MSDS) for the spilled material to the medical person providing care.
· Contain spill to prevent material from entering the environment, including outside air, soil, surface water, and groundwater. Package recovered spilled material for reuse or disposal.

· Arrange for contract disposal firm to clean up spill and package spilled material, if necessary.

· Inform corporate Safety and Health Manager of incident.

· Prepare incident report and copy Company Communications and Environmental personnel.

c. Plant Environmental Personnel

· Quantify material that was released to the environment (released material equals spilled minus recovered material).

· Determine whether or not material and amount released is reportable under one of more environmental federal or state statutes.

· Notify Corporate Environmental Department of spill incident. Home telephone number of Corporate Environmental Manager should be included in Plant's SPCC or contingency plan. Confirm reportability of incident. If reportable, obtain concurrence of Corporate Environmental Affairs and Legal Department prior to reporting.

· Report verbally to appropriate regulatory agency, usually immediately or within 24 hours of release. Follow-up with written report, if required. Keep records of verbal and written reports to regulatory agencies on file.

· Arrange for proper transport and disposal of recovered spilled material. If spilled material has not been adequately contained and recovered, arrange for additional containment and cleanup activities.

d. Plant Communications Personnel or designated spokesperson

· Based on information received from Plant Protection and Environmental personnel, and in consultation with the Plant Manager and the Corporate Communications Manager, prepare a statement and responses to questions that may be raised by the media, citizens, local emergency responders or plant employees.

· Respond to all internal and external inquiries concerning the incident.

· Maintain contact with Plant Protection and Environmental personnel and Corporate Communications Manager until situation is resolved.

e. Corporate Safety and Health Manager

· Provide guidance to Plant Protection personnel, as needed.
· Maintain contact with Plant Protection personnel until situation is resolved.

· Notify appropriate Corporate Legal, Communications, and Administrative management if incident has potential to develop into personnel or product liability issues for the Corporation.

f. Corporate Environmental Manager

· Provide guidance to Plant Environmental personnel, as needed. Confirm determination of need to report to regulatory agencies. Inform and obtain concurrence with Legal Department on reporting, prior to advising Plant Environmental personnel to report to regulatory agencies.

· Maintain contact with the Plant Environmental personnel until situation is resolved.

· Notify appropriate Legal, Communications, and Administrative management if incident has potential to develop into personnel, third party, or property damage liability issues for the Corporation.

g. Corporate Communications Manager

· Provide guidance to Plant Communications personnel, as needed.

· Prepare Corporate's statement on the incident for the employees and the media, if needed.

· Maintain contact with Plant Communications personnel and with Corporate Safety and Health and Environmental Managers until situation is resolved.

· Notify Corporate management if incident has potential to result in media coverage at the plant location or nationally.

h. Corporate Legal Personnel

· Provide legal assistance, as needed.

· Notify legal management if incident has potential to result in liabilities for the Corporation.

REPORTING REQUIREMENTS

The following tables summarize federal and state/provincial spill reporting requirements for THOR Industries operating facilities:

· Table 1 - federal regulatory requirements for releases of contaminants to air, soil, and water.
Table 2 - summary of reporting requirements and the name and number of the designated emergency response agency. State and Provincial regulations generally provide for centralized reporting through a designated emergency response agency.

Revision History

1. New procedure issued 02/28/2020
<table>
<thead>
<tr>
<th>Regulation</th>
<th>Reference</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>AIR</td>
<td>40 CFR 61-99</td>
<td>No broad-based reporting requirements. Refer to facility permits, state and local regulations, and SARA Title III regulations.</td>
</tr>
<tr>
<td>Clean Air Act</td>
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<tr>
<td>PETROLEUM UNDERGROUND/ABOVE GROUND STORAGE TANKS</td>
<td>40 CFR 28040 CFR 112</td>
<td>Report leak or release to implementing agency within 24 hours. Report to National Response Center (800/424-8802) within 24 hours if leak from tank with capacity of more than 42,000 gallons into navigable waters.</td>
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<tr>
<td>UST Release Reporting</td>
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<tr>
<td>AST Release Reporting</td>
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<tr>
<td>SARA TITLE III</td>
<td>40 CFR 355</td>
<td>Notification to Local Emergency Planning Committee (LEPC) and State Emergency Response Commission (SERC) immediately following incident of emergency release where exposure occurs offsite.</td>
</tr>
<tr>
<td>Emergency Release Reporting</td>
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<tr>
<td>WATER</td>
<td>40 CFR 112</td>
<td>Report spills to National Response Center (800/424-8802). Maintain records of all spills reported to EPA greater than 1,000 gallons or two spills of harmful quantities within one year reported to EPA.</td>
</tr>
<tr>
<td>Chemical and Oil Spills (SPCC)</td>
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<tr>
<td>HAZARDOUS WASTE / SUBSTANCES</td>
<td>40 CFR 302</td>
<td>Report 103(a) releases of hazardous substances to administering agency. A reportable quantity (RQ) ranges from less than one pound to more than 5,000 pounds.</td>
</tr>
<tr>
<td>CERCLA Hazardous Substance Spills</td>
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<tr>
<td>Hazardous Waste Sites</td>
<td>40 CFR 302 103 (c)</td>
<td>Notify administering agency of known, suspected, or likely releases from a facility.</td>
</tr>
<tr>
<td>Regulation</td>
<td>Reference</td>
<td>Requirements</td>
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<tr>
<td><strong>INDIANA</strong></td>
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<tr>
<td>Indiana &quot;Spill Law&quot;</td>
<td>327 IAC 2-6</td>
<td>Immediately notify Indiana Office of Environmental Response at (317) 241-4336, Department of Environmental Management, of any spill of oil, hazardous or otherwise objectionable substance in a quantity that threatens human health or the environment or is otherwise reportable under federal statutes. UST releases must also be reported within 24 hours to same office unless already reported under CERCLA 302.</td>
</tr>
<tr>
<td>Indianapolis, Indiana Air Regulations, Malfunction and Scheduled Maintenance</td>
<td>Indianapolis Air Pollution Control Board, Regulation VII-C</td>
<td>Facilities with Indianapolis Air Pollution Control Board permits must comply with the applicable malfunction and scheduled maintenance reporting requirements in Regulation VII.</td>
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<tr>
<td><strong>OHIO</strong></td>
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<tr>
<td>Ohio Emergency Planning and Community Right to Know Act; Ohio Hazardous Waste Management Regulations; Ohio Fire Code</td>
<td>OAC Title 37 Chapter 3750; ORC Title 3745 Chapters 50-69; ORC Article 28, Section FM-2810.0</td>
<td>Report spills/releases of reportable quantities of CERCLA/SARA substances or releases of hydrocarbons that threaten waters of the state to the Ohio Emergency Response Office, (800) 282-9378; Report within 24 hours any indication of release/spill from UST or unusual operating conditions to State Fire Marshall's Office, Bureau of USTs, at (800) 686-2878.</td>
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<tr>
<td>Ohio Air Regulations</td>
<td>OAC 3745-15-06</td>
<td>Report any maintenance or malfunction causing bypass of emission control equipment to the Regional Air Pollution Control Agency (Springfield) at (513) 325-7097. If malfunction continues for more than 72 hours, a written report must be provided within two weeks of the date the malfunction occurred.</td>
</tr>
<tr>
<td>Regulation</td>
<td>Reference</td>
<td>Requirements</td>
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<td>MICHIGAN</td>
<td>MAC r.324.2007, 1008</td>
<td>Immediately notify Michigan Pollution Emergency Alert System (PEAS) at (800) 292-4706 of any spill of oil, hazardous or otherwise objectionable substance in a quantity that threatens human health or the environment or is otherwise reportable under federal statutes. Michigan requires owner operator to file a spill or release report with the local DEQ district office and local health department within 10 days of the release. Owner/operators may be required to file a Report of Loss with the Office of Geological Survey.</td>
</tr>
<tr>
<td>Oregon</td>
<td>OAR 340-142-0005 and OAR 340-142-0050</td>
<td>Immediately notify Oregon Emergency Response Center at (800) 452-0311, and the National Response Center (800)-424-8802/ of any spill of oil to waters of the state, Oil spills on land in excess of 42 gallons and any hazardous material greater than or equal to the quantity listed in the Code of Federal Regulations 40 CFR Part 302. within 24 hours.</td>
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<tr>
<td>Idaho</td>
<td>58.01.02.851 and 58.01.07.200</td>
<td>Any release that exceeds 25 gallons or causes a sheen on surface waters must be reported with 24 hours of discovery to the Idaho Department of Environmental Quality (800)424-8802. Less than 25 gallons without a sheen does not have to be reported unless the spill cannot be cleaned up within 24 hours.</td>
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ENVIRONMENTAL PROCEDURE EMS 02
SPILL PREVENTION

BACKGROUND

Regulations

<table>
<thead>
<tr>
<th>40 CFR Part</th>
<th>Subject</th>
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<tr>
<td>112</td>
<td>Oil Pollution Prevention (SPCC Plan)</td>
</tr>
<tr>
<td>264</td>
<td>RCRA Permitted Facility Standards</td>
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<tr>
<td>265</td>
<td>RCRA Interim Status Facility Standards</td>
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</table>

Applicability

The requirement to maintain and periodically update a Spill Prevention Control and Countermeasure (SPCC) plan applies to all non-transportation-related onshore and offshore facilities from which a discharge of oil into or upon navigable waters of the United States could result.

Generators of hazardous waste are required to prepare a Contingency Plan designed to minimize the hazards to human health and the environment. The facility Spill Prevention Control and Countermeasure Plan may be amended to serve this purpose.

General Requirements

1. Owners and operators of affected facilities (more than 42,000 gallons of oil underground or more than 1,320 gallons of oil above ground) are required to prepare an SPCC Plan within six months of the effective date. The Plan should be fully implemented within one year of the effective date. If a facility becomes operational after the effective date, the six month and one year deadlines are effective from the date that the facility begins operations.

2. The SPCC Plan must be reviewed and certified by a registered professional engineer. The SPCC Plan must also be approved by facility management at a level that guarantees necessary resource committal (usually the general manager). A copy of the plan must be maintained at the affected facility and must be available for agency review during normal working hours. Where the SPCC Plan is amended to meet contingency plan requirements for generators, copies of that plan must be submitted.
to all local police departments, fire departments, hospitals, and state and local 
emergency response teams that may be called upon to provide emergency service.

3. The SPCC Plan must specify procedures, equipment, and resources necessary to 
assure that any discharge of oil is kept from entering the navigable waters of the 
United States or adjoining shorelines.

GUIDANCE PLAN

1. All THOR Industries facilities, that are required to have SPCC plans, will review and 
amend their Spill Prevention Control and Countermeasure Plans every three years or 
when there is a change in facility design, construction, operation, or maintenance 
which materially affects the facility's potential for the discharge of oil into or upon 
the navigable waters of the United States or adjoining shorelines.

2. All other THOR Industries facilities which store oil below SPCC requirements but 
have potential for spills are encouraged to prepare a spill prevention plan.

3. THOR Industries facilities will include in the SPCC Plan all onsite potentially 
hazardous or harmful liquids. All types of storage systems will be addressed; drums, 
aboveground tanks, underground tanks, and others equal to or greater than 50 
gallons.

4. Each facility shall investigate the need of existing floor drains and consider sealing 
those that are not needed or pose potential for contamination. Facilities must 
maintain drainage maps showing the locations and ultimate discharge points of all 
floor drains sill in use.

5. Each THOR Industries facility will prepare a plot plan that indicates the location, 
type, depth, and contents of all storage tanks. Storage tanks shall be managed to 
prevent leaks and spills and maintain tank integrity.

Revision History

1. New procedure issued 2/24/2020
1.0 PURPOSE

To comply with applicable Polychlorinated Biphenyl (PCB) regulations.

2.0 SCOPE

The PCB regulations apply to all persons and facilities located within the U. S., who manufacture, process, distribute in commerce, use, store or dispose of PCBs or PCB items.

3.0 REFERENCES/LINKAGES

In the U. S.: 40 CFR Part 761 - Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce and Use Prohibitions Outside U. S.: Applicable local regulations concerning PCBs

4.0 DEFINITIONS

Large high voltage capacitor means a capacitor which contains 1.36 kg (3 lbs.) or more of dielectric fluid.

Fluorescent light ballast means a device that electrically controls fluorescent light fixtures and that includes a capacitor containing 0.1 kg or less of dielectric fluid.

PCB Article means any manufactured article, other than a PCB Container, that contains PCBs. PCB Article includes capacitors, transformers, electric motors, pumps, pipes and any other manufactured items.

PCB-Contaminated Electrical Equipment means any electrical equipment including, but not limited to, transformers, capacitors, circuit breakers, reclosers, voltage regulators, switches, electromagnets, and cable, that contains PCBs at concentrations of ≥ 50 ppm and < 500 ppm in the contaminating fluid.

PCB Item means any PCB Article, PCB Article Container, PCB Container, PCB Equipment, or anything that deliberately or unintentionally contains or has as a part of it any PCB or PCBs.

PCB bulk product waste includes 1. Non-liquid bulk wastes or debris from the demolition of buildings and other man-made structures manufactured, coated, or serviced with PCBs; 2. PCB-containing wastes from the shredding of automobiles, household appliances, or industrial appliances; and 3. Fluorescent light ballasts containing PCBs in the potting material (the tar like insulation material inside the ballast).

5.0 GENERAL REQUIREMENTS

All authorized use of PCBs or PCB items, regardless of concentration, must be in totally enclosed systems. For purposes of this Environmental Procedure, “PCB Items” are those items and/or materials that contain or are suspected to contain PCBs. All PCB facility design will minimize the risk of PCBs entering the environment. All PCB-contaminated equipment and containers, whether in use or storage, must be marked with a label that follows the official format of 40 CFR Part 761.45, or applicable requirements in regions outside the jurisdiction of U. S. EPA. The labeling requirement does not apply to fluorescent light ballasts that are still in use.
All PCBs and PCB items placed into storage for subsequent disposal must be removed from storage and disposed of within one year from the date first placed into storage unless applicable federal, state or local requirements prohibit otherwise. The storage facilities should meet the following criteria:

1. Adequate roof and walls to prevent rainwater from reaching the stored PCBs and PCB items.

2. An adequate floor which has continuous curbing with a minimum six-inch high curb. The floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB article or PCB container stored therein or 25 percent of the total internal volume of all PCB articles or PCB containers stored therein, whichever is greater.

3. No drain valves, floor drains, expansion joints, sewer lines or other openings that would permit liquids to flow from the curbed area.

4. Floors and curbing constructed of continuous smooth and impervious materials, such as Portland cement concrete, or steel, to prevent or minimize penetration of PCBs.

5. Not located at a site that is below the 100-year flood water elevation.

6. All PCBs shall be handled and disposed of according to applicable regulations. For facilities located in the U. S., such regulation is provided in 40CFR761. PCBs and PCB items should be disposed of in an approved manner. See below for handling and disposal requirements.

7. At time of shipment or transfer for disposal, PCBs and PCB items shall be appropriately manifested according to applicable local regulations, for U. S. facilities, the regulation is specified in 40CFR761.207.

THOR Industries facilities may continue to use fluorescent lighting fixtures with ballasts containing PCBs in capacitors or potting material. After these fluorescent light ballasts are removed from service, THOR Industries facilities may perform an analysis of the ballasts to determine PCB levels in the capacitors and potting material. Facilities may handle non-PCB containing fluorescent light ballasts as industrial non-hazardous waste in accordance with relevant local and state requirements. Light ballasts that contain PCBs, or for all ballasts the facilities decide not to analyze, should be managed as PCB Bulk Product wastes in accordance with 40 CFR 761.65 (c)(9) requirements.

6.0 RESPONSIBILITY/ACCOUNTABILITY

As listed in Section 7.

7.0 ACTIONS

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<tr>
<th>Step #</th>
<th>Responsibility</th>
<th>Procedure Action</th>
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<tbody>
<tr>
<td>1.</td>
<td>Facility Environmental Manager</td>
<td>Each THOR Industries facility with PCBs will prepare a plot plan indicating locations of PCB storage areas and PCB transformers and large capacitors currently in use. The inventory of PCB transformers and capacitors and plot plan should be updated annually.</td>
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<tr>
<td>2.</td>
<td>Facility Environmental Manager</td>
<td>All THOR Industries facilities will conduct an audit of potential PCB transformers and large capacitors and establish concentration levels and an inventory.</td>
</tr>
</tbody>
</table>
3. Facility Environmental Manager  Each facility will prepare a containment plan for PCB transformers still in service and all stored PCBs and PCB equipment currently not in service.

4. Facility Environmental Manager  Each THOR Industries facility with PCB large capacitors will review the need for these capacitors and potential replacement with PCB-free capacitors.

5. Facility Environmental Manager  Each facility that currently has PCB transformers in very good condition, structurally and operationally, should consider declassifying said transformers to non-PCB status (For facilities located in the U. S. less than 50 ppm PCB).

6. Facility Environmental Manager  Each THOR Industries facility that currently has PCBs or PCB items (not including fluorescent light ballasts) in use or in storage will prepare a phased removal plan. The plan will prioritize removal based on the length of storage allowable (1 year maximum), the concentration of PCBs in the liquid and the location of the PCB item as to spill and exposure potential. The removal schedule will address the highest priority items first.

HANDLING AND DISPOSAL REQUIREMENTS FOR U. S. FACILITIES

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<tr>
<th>Step #</th>
<th>Responsibility</th>
<th>Procedure Action</th>
</tr>
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<tbody>
<tr>
<td>1.</td>
<td>Facility Environmental Manager</td>
<td>All items and materials that are suspected to or actually contain PCBs shall be disposed of in a TSCA approved facility in conformance with 40 CFR 761.</td>
</tr>
</tbody>
</table>
| 2.     | Facility Environmental Manager | A facility may segregate non-PCB containing items and/or materials and dispose of those non-PCB items and/or materials as a non-hazardous waste IF AND ONLY IF the facility undertakes an appropriate inquiry and/or testing of the items and/or materials and determines that those segregated items and/or materials do not contain PCBs. For example, an appropriate inquiry would include a survey of the manufacturer of the item and/or material to determine whether the item and/or material had originally or currently contain PCBs. For example, see 63FedReg35384 for suggested survey of Fluorescent Lighting ballasts. Unless the facility segregates all non-PCB containing items from all
PCB containing items and/or materials, the facility MUST handle and dispose of, including appropriate manifesting, ALL items and/or materials as though the items and/or materials contained PCBs.

1.0 RECORDS/METRICS

All inspection records and related documents must be filed and maintained in accordance with appropriate corporate record retention policies and procedures.

2.0 CHANGE REVISION

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<th>Revision</th>
<th>Change</th>
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BACKGROUND

Regulation

40 CFR Part 61, Subpart M - Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAPs)

Applicability

All facilities that demolish or renovate equipment, buildings, etc., that contain asbestos must comply with the regulations contained in 40 CFR 61 Subpart M.

General Requirements

The regulations in each state may vary from those described in 40 CFR Part 61 Subpart M. However, the individual state regulations will be at least as stringent.

All asbestos removal must be conducted according to the following criteria:

1. The facility will notify the applicable state or federal authority prior to asbestos removal. The time required for notification will vary from state to state and may depend upon the amount of asbestos being removed.

2. All asbestos must be removed from a facility that is being demolished or renovated before any wrecking or dismantling that would break up the materials or preclude access to the materials for subsequent removal.

3. All friable asbestos to be removed must be adequately wetted. A local exhaust ventilation and collection system designed and operated to capture the particulate asbestos material produced by the stripping and removal of the friable asbestos materials. The system can not exhibit visible emissions to the outside air.

4. All stripped asbestos materials must be maintained in a wetted condition until they are collected for disposal. Disposal will be accomplished in an approved landfill.
GUIDANCE PLAN

1. All THOR Industries facilities will conduct an audit and inventory the condition and type of installed asbestos and/or asbestos in storage. Each facility will also calculate the estimated asbestos removal and disposal costs.

2. Each facility will prepare a prioritized management plan for the removal or continued maintenance of asbestos found during the audit. Criteria for segregating priorities will include potential for employee and public exposure, potential for damage to insulation covers, and condition of insulation. The labeling of asbestos in certain areas will also be included in the plan.

3. Actual removal and handling of asbestos must be conducted by persons certified by the Occupational Safety and Health Administration (OSHA) to conduct such work.

4. In the event that an outside contractor is hired for asbestos removal, an "Asbestos Removal Checklist" must be completed. The Checklist is included in this procedure. At the completion of the project, a closure report, which shows the amount of asbestos removed, air monitoring and personnel monitoring records, should be submitted to the facility.

5. Each THOR Industries facility shall maintain a general layout showing the location of asbestos-containing materials. This drawing shall be updated as the facility's asbestos status changes with asbestos maintenance or removal.

6. All asbestos must be removed from a facility that is being demolished or renovated before any wrecking or dismantling that would break up the materials or preclude access to the materials for subsequent removal. Notification of such activity must be submitted to the required agencies at 20 days before demolition begins. Notification is also required even when no asbestos is present.

Revision History

1. New procedure issued 02/24/2020
THOR INDUSTRIES INC.

ASBESTOS REMOVAL CHECKLIST

1. Are the persons that will conduct the actual removal of asbestos certified by the Occupational Safety and Health Administration? Yes __ No __

2. Has a written procedure for the asbestos removal been prepared by the removal contractor and approved by THOR Industries? Yes __ No __

3. Does the asbestos removal contractor require annual physicals and chest x-rays of the persons conducting the asbestos removal? Yes __ No __

4. Have the necessary State and/or Federal agencies been notified? Yes __ No __

5. Has the asbestos removal contractor provided for personnel and ambient area monitoring for airborne asbestos? Yes __ No __

6. Are the asbestos disposal containers of the proper type and are they properly labeled? Yes __ No __

7. Has the asbestos removal contractor committed to the use of proper respirator protection and proper protective clothing? Yes __ No __

8. Has the asbestos removal contractor provided proper change rooms, shower facilities, and lunchrooms for the persons conducting the asbestos removal? Yes __ No __

9. Has the asbestos removal contractor agreed to keep and provide to THOR Industries Inc copies of all training certificates for persons removing asbestos, all monitoring reports, and information relative to physical exams and chest x-rays of persons removing asbestos? Yes __ No __

10. Does the asbestos contractor carry sufficient liability insurance ($1,000,000 or more)? Yes  No

NOTE: The answer to all Checklist questions must be "Yes" in order to proceed with asbestos removal.
BACKGROUND

Regulations

<table>
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<td>Land Disposal Restrictions</td>
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<td>280</td>
<td>UST Technical Standards and Corrective Action Requirements</td>
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Applicability

The regulations that govern the handling of hazardous wastes apply to all facilities that generate, store, treat and/or subsequently ship hazardous wastes offsite for disposal. Hazardous waste includes many listed substances, as well as those which exhibit characteristics of ignitability, corrosivity, reactivity and toxicity. The RCRA regulations were first established in 1980 and are frequently updated.

General Requirements

1. Hazardous waste generators and transporters must obtain an EPA identification number. They must follow specific procedures for labeling hazardous waste containers and for tracking the movement of waste from one facility to another. Exceptions to the normal waste manifest procedures must be reported to the EPA.

2. Hazardous waste treatment, storage, and disposal facilities are required to obtain Resource Conservation and Recovery Act (RCRA) permits. Common exemptions from permit requirements include onsite storage of hazardous wastes for 90 days or less, "small quantity" hazardous waste generators, and NPDES-permitted wastewater facilities. Owners/operators of permitted facilities must demonstrate financial
responsibility for closure. They must also demonstrate liability coverage for sudden and non-sudden accidental occurrences.

3. The Hazardous and Solid Waste Amendments (HSWA) of 1984 expanded the RCRA Hazardous Waste Program. HSWA contains over 90 statutory deadlines, most of which must be met by 1990, including deadlines for RCRA permit applications and permit issuance. Major new provisions are corrective action, exposure assessments, disposal prohibitions, waste minimization, and regulation of underground storage tanks (USTs).

4. A new hazardous waste manifest form was issued in 1986 with an operator certification that a program is in place to reduce the volume and toxicity of waste generated to the degree determined to be economically practicable. Each facility that generates hazardous waste is required to have a written plan that minimizes waste production. Annual reports are required that indicate the progress of waste minimization plans.

GUIDANCE PLAN

1. Each THOR Industries facility will develop a written hazardous and non-hazardous waste minimization plan.
   a. This plan shall emphasize pollution prevention as a means of waste minimization.
   b. Facility management will conduct annual review to determine whether the goals of the waste minimization plan are being met.

2. Each THOR Industries facility will evaluate the segregation of waste materials to allow maximum recycling and reuse. The segregation plan will give priority to high volume, high toxicity waste streams.

3. THOR facilities shall review possible raw material substitutions to result in the generation of a less toxic or non-hazardous waste.
   a. Each facility will evaluate the use of non-hazardous solvents, adhesives and paints, as applicable.
   b. The evaluation will consider fluid performance, cost and ease of treatment, and disposal, as applicable.

4. Each facility will develop a program that promotes employee participation in waste minimization methods and procedures.
5. Each THOR Industries facility will implement a program to adequately train appropriate personnel in the proper procedures for handling hazardous waste. This will include handling during generation, storage, and preparation for transportation.

2019 Hazardous Waste Generator Final Rule - Revision 2019

1. Allowing very small quantity generators to send hazardous waste to a large quantity generator that is under the control of the same person and consolidate it there before sending it on to a RCRA designated facility.

2. Allowing a VSQG or SQG to maintain its existing generator category in the case of an episodic event. Planned events must notify state agencies 30 days prior to the event. Unplanned events must notify state agencies within 72 hours of event.

3. Updating the emergency response and contingency planning provisions for SQGs and LQGs to include Local Emergency Planning Committees (LEPC) among those emergency planning organizations with which a generator may make response arrangements and to require that new and existing LQGs submit quick reference guides with the key information when they either develop or update their contingency plans to local responders for easy access during an event.

4. Requiring periodic re-notification for SQGs every four years (SQGs only notify once under the current system).

5. Revising the regulations for labeling and marking of containers and tanks to clearly indicate the hazards of the hazardous waste contained inside.

6. Clarifying inconsistent guidance on which generator category applies when a generator generates both acute and non-acute hazardous waste in a calendar month.

7. Revising the regulations for completing the RCRA biennial report to be consistent with the current instructions distributed with the form.

8. Replacing the phrase “conditionally exempt small quantity generator” with the phrase “very small quantity generator” to be consistent with the other two generator categories — LQGs and SQGs.

9. Revising the regulations for completing the RCRA biennial report to be consistent with the current instructions distributed with the form.

10. Moving the VSQG regulations from section 261.5 of Title 40 of the Code of Federal Regulations (CFR) into 40 CFR part 262, where the regulations for SQGs and LQGs are located.
11. Moving a number of the generator regulations that are currently located in other parts of the hazardous waste standards into 40 CFR part 262 to replace the current lists of cross references.

Revision History

1. New procedure issued 02/24/2020
BACKGROUND

Regulations

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<td>372</td>
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Applicability

SARA Title III regulations, effective in 1986, establish requirements for federal, state, and local governments and industry regarding emergency planning and "community right-to-know" reporting on hazardous and toxic chemicals.

General Requirements

1. The SARA Title III regulations are organized into three major sections; Emergency Planning and Notification, Hazardous Chemical Reporting, and Toxic Chemical Release Reporting - Emissions Inventory.

2. The emergency planning regulations are designed to develop state and local governments' emergency response and preparedness capabilities through better coordination and planning, especially within the local community. The Act requires that the state establish a State Emergency Response Commission, local emergency planning districts, and Local Emergency Planning Committees.

   The local committee's primary responsibility will be to develop an emergency response plan. In developing this plan, the local committee will evaluate available resources for preparation and response to a potential chemical accident.

3. The emergency notification provisions of the act require that facilities immediately notify the Local Emergency Planning Committee and the State Emergency Response Commission if there is a release of a listed hazardous substance that exceeds the reportable quantity for that substance. The initial notification can be by telephone, radio, or in person. The regulation also requires a written follow-up notice after the release.
4. The community Right-to-Know sections of the act require that all facilities have available Safety Data Sheets (SDS) which meet the requirements of the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard. These SDS are available to the Local Emergency Planning Committee, the state emergency response commission, and the local fire department through the use of the online Emergency Right to Know website used for the annual reporting.

5. SARA Title III also requires that each facility that meets threshold limits, complete an annual toxic chemical release form (Form R) for specified chemicals. The form must be submitted to EPA or state officials on or before July 1 of each year. The information from these forms is used to establish a national data base of toxic chemicals released into the environment.

GUIDANCE PLAN

1. All THOR Industries facilities will obtain and have available SDS for all hazardous chemicals on the plant site. A program will be developed with health & safety professionals at the facilities to:

   a. ensure updated SDS are received, as they become available from chemical manufacturers.
   
   b. ensure data received is complete and meet all regulatory requirements.
   
   c. provide new training and information to employees, as changes in SDS warrant.

2. Each facility will submit the required SDSs for any new chemicals exceeding reporting thresholds during annual reporting.

3. Each manufacturing facility will develop a program to collect and maintain the information necessary to submit the annual toxic chemical release form (Form R).

4. Appropriate personnel will be designated at each manufacturing facility to respond to outside inquiries concerning substances reported on the toxic chemical release form.

5. Each THOR Industries facility is encouraged to participate actively in the Local Emergency Planning Committee.

6. Each facility will develop a guideline for reporting hazardous substance releases to the applicable regulatory agencies.

Revision History

1. New procedure issued 02/24/2020
THOR INDUSTRIES INC

ENVIRONMENTAL PROCEDURE NO. 07
Environmental Training

1) PROCEDURE NAME:
   Environmental Training

2) PURPOSE:
   To ensure that all employees who perform any functions that may create a significant impact upon the environment receive appropriate training.

3) SCOPE:
   All THOR Industries manufacturing operations, service/parts centers and offices.

4) DEFINITIONS:
   Environmental Organization Member – Any employee who has environmental management responsibilities as part of his/her job description
   Environmental Staff Member – Any employee whose main responsibilities are related to the facility’s environmental management system
   Environmental Coordinator – Any employee whose main responsibility is the overall management of the facility’s environmental management system

5) RESPONSIBILITY:
   As described under PROCEDURE.

6) PROCEDURE:

   Step #   Responsibility          Procedure Action
   1.       Facility Management    Establish and implement a facility-specific procedure to identify environmental training needs for all facility personnel and on-site contractors. Training needs should take into account skills, education, or other qualifications of the job functions that may have significant impacts upon the environment.
   2.       Env. Coordinator       Each facility’s environmental training program should address emergency preparedness and response requirements, hazardous waste management, OSHA Hazard Communication Standard and the use of the facility’s SDS system as appropriate. As a facility implements an Environmental Management System, each facility should conduct awareness training which includes the following: 1. The importance of conformance with the regulatory environmental requirements, THOR Industries Environmental Protection Policy, the Company and the facility’s
environmental management systems. 2. The actual or potential significant environmental impacts of the facility manufacturing activities, the environmental benefits of improved environmental performance and the potential consequences of departure from specified operational procedures. 3. The employees’ role and responsibilities in achieving conformance with the THOR Industries Environmental Protection Policy and the Company’s environmental management system.

3. Env. Coordinators  Maintain training records per facility’s record control procedure. On a periodic basis, each facility should report training of Environmental Staff Members to THOR Industries Environmental department.

4. Env. Staff Member  Within six months of becoming an Environmental Staff Member, attend a 3-5 day seminar usually presented by recognized consultants and trainers on an overview of environmental regulations. Individuals who have attended an equivalent seminar within the past five years or those who have obtained certification as Qualified Environmental Professionals are exempted from this requirement.

5. Env. Org./Staff Members  Environmental Staff Members at facilities should receive a training focused on the individual’s training needs and job requirements.

6. Facility Management  Periodically review the facility specific training procedures used to identify training needs to ensure that proper environmental training is being provided.

7) RECORDS:
   Training Records

8) REFERENCES:
   Environmental Procedure EMS11 – Retention of Environmental Records

9) REVISION HISTORY:

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<tr>
<td>0</td>
<td>03/02/2020</td>
<td>New Procedure</td>
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THOR INDUSTRIES INC.
ENVIRONMENTAL PROCEDURE EMS 08
CONTAINER MANAGEMENT

BACKGROUND

THOR Industries facilities may store a variety of oils, solvents, chemicals and wastes in containers, such as drums, roll-off boxes or other portable storage devices. Proper container management can minimize problems such as leaks, spills, improper management and improper disposal. Various hazardous waste, spill prevention, notification and reporting requirements may apply to container management.

Regulations

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<td>Oil Pollution Prevention (SPCC Plan)</td>
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<tr>
<td>261</td>
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<td>262</td>
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<td>264.170-178</td>
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<tr>
<td>302</td>
<td>Designation, Reportable Quantities and Notification (Superfund)</td>
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<td>355</td>
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<td>370</td>
<td>Hazardous Chemical Reporting: Community Right-to-Know (SARA Title III)</td>
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</tbody>
</table>

Applicability

Oil spill regulations at 40 CFR 112 establish procedures, methods, and equipment to prevent the discharge of oil from non-transportation related facilities into or upon navigable waters. The regulations impact facilities which store more than 1,320 gallons of oil aboveground. Oil is defined as "...any kind or in any form, but not limited to petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes..."
Resource Conservation and Recovery Act (RCRA) regulations at 40 CFR 261 define hazardous waste. RCRA 40 CFR 262 applies to generators of hazardous waste. Regulations at 40 CFR 264 and 265 address the storage of hazardous waste in containers at permitted and interim status facilities, respectively. The interim status container management standards also apply to some non-permitted facilities that manage hazardous wastes.

Superfund and SARA Title III (Emergency Planning and Community Right-To-Know) regulations at 40 CFR 302, 355, and 270 identify hazardous substances and reportable quantities, threshold planning quantities and responsibilities, and reporting requirements to provide the public with important information on hazardous chemicals in the community.

**General Requirements**

1. Facilities affected by 40 CFR 112 must prepare a Spill Prevention, Control and Countermeasure (SPCC) Plan.
   a. The Plan must be reviewed and certified by a registered professional engineer.
   b. The Plan must be approved by facility management at a level that guarantees the necessary resource committal.
   c. A copy of the Plan must be available onsite for review during normal working hours.
   d. The Plan must be reviewed once every three years. Any changes made to the spill control system require amending the Plan within six months and recertification by a registered professional engineer.
   e. The facility owner or operator must report spills of 1,000 gallons or more into navigable waters to U.S. Environmental Protection Agency (EPA) Regional Administrator within 60 days of the occurrence.

2. Regulations at 40 CFR 261 define listed and characteristic hazardous wastes which are subject to the RCRA rules. Hazardous waste must be managed under specific standards detailed for Generators, Transporters, Permitted and Interim Status facilities, etc.

3. RCRA 40 CFR 262 covers shipping manifests and pre-transport requirements including packaging, labeling, marking, placarding and accumulation time. The accumulation standards (40 CFR 262.34) apply to management of hazardous wastes for 90 days or less without a permit or interim status.
4. RCRA Permitted Facility Standards, Subpart I (40 CFR 264.170-178) require weekly inspection of containers and the container storage area, impervious pavement with adequate containment, segregation of incompatible materials, and proper closure of hazardous waste storage areas.

5. RCRA Interim Status Standards, Subpart I (40 CFR 265.170-177) cover the same topics as Permitted Facility Standards, with the exception of closure requirements. The accumulation standards for container storage of hazardous wastes for 90 days or less incorporate the Interim Status standards.

6. The CERCLA (Superfund) regulations at 40 CFR 300 and 302 establish Reportable Quantities for spill reporting. The SARA Title III regulations at 40 CFR 355 and 370 identify the substances affected by emergency release planning and notification requirements, Material Safety Data Sheet (MSDS), and inventory reporting of the regulated substances. If a spill occurs, CERCLA and SARA Title III Reportable Quantities are as little as one pound for certain substances.

GUIDANCE PLAN

1. All THOR Industries facilities should have knowledge and control of all substances stored in drums or other containers which have the potential to spill or to impact health, safety, or the environment. These substances include, but are not limited to, raw materials, lubricants, solvents, and wastes. The inventory process should include:
   a. Keeping a current listing of the names, amounts, and locations of materials stored in containers, and length of time stored.
   b. Maintaining current safety data sheets (SDS), which are obtained from suppliers.
   c. Determining whether materials stored in containers are affected by the regulations described above.
   d. Notifying the local and state commissions of the presence and quantities of regulated substances, as required by SARA.
   e. Ensuring the compatibility of the container and stored material.
   f. Ensuring that containers are properly labeled, including date storage began (for RCRA wastes).

2. Each THOR Industries facility shall provide container storage areas with suitable secondary containment to prevent leaks and spills from exiting the storage area. Containers will be managed as follows:
a. Segregate containers to separate potentially incompatible substances. Store ignitable or reactive wastes at least 50 feet from the property line.

b. Segregate RCRA hazardous waste container storage areas from other container storage areas. Provide fence with a locked gate and required signs for hazardous waste storage areas. Label hazardous waste drums and other containers in accordance with applicable regulations.

c. Any container which is not in good condition (e.g., rusting, leaking, or with structural defects) will be emptied or placed into an overpack drum to minimize spills.

d. Keep hazardous waste drums closed while in the storage area, except when waste is added or removed.

3. Each THOR Industries facility will develop a visual inspection program.

a. Staff will conduct the inspections at least weekly, examining for leaks and deterioration caused by corrosion, punctures, improper storage or handling, and other factors.

b. Each facility will document the inspection on a form which shows the name of the inspector, date and time of inspection, types of deficiencies for which the area is to be inspected, types of deficiencies noted, corrective actions required (if any), and dates of corrective action.

c. The Environmental Coordinator and/or Plant Manager will be notified of spills or deficiencies in the container storage area which could impact its compliance status, or could cause impacts to the soil, surface water or groundwater.

4. Each THOR Industries facility will prepare a written contingency and spill prevention plan.

a. If the facility is subject to SPCC regulations, the plan will include the required information in a format that satisfies the requirements.

b. The document will include a plot plan of the facility identifying the substances, type(s) of containers, and amounts stored in each location.

c. THOR facilities shall send a copy of the plan to the local fire department and hospitals and other emergency response organizations who may be called in the event of a spill or upset. THOR Industries shall provide orientation tours to representatives of the local emergency response organizations if requested.
Facility staff shall report spills as required under SPCC, CERCLA, SARA Title III and applicable state and local regulations. Refer to THOR Industries Environmental Procedure No. 1, Environmental Reporting and No. 9, Relations with Regulatory Agencies, for details.

5. Each THOR Industries facility will send drummed hazardous wastes to permitted offsite disposal facilities within 90 days of the start of accumulation to preclude being designated as a hazardous waste storage facility. This excludes accumulation in satellite areas prior to placement in the hazardous waste storage area.

   a. Manifests will accompany all shipments.
   b. Facilities will establish procedures to ensure proper disposal.
   c. Facilities will establish a manifest tracking and filing system as required by recordkeeping regulations.

6. THOR Industries facilities shall not give or sell empty drums to employees or other individuals. Empty drums will be managed as follows:

   a. Empty drums will be returned to the supplier when possible. Other drums in good condition may be sold to pre-qualified drum reconditioners after the drums have been properly decontaminated and cleaned.
   b. Labels, tags, or other markings identifying the drums as THOR Industries property will be removed or obliterated. Any markings related to chemical toxicity, health or safety hazards will be retained.
   c. Damaged drums will be properly cleaned, and crushed as appropriate to the drum's contents. If the material contained in the drum is explosive, either an explosion-proof crusher will be used or the drum will not be crushed. Crushed drums may be sold to scrap metal recyclers (dealers) or disposed of in a permitted landfill.

**Revision History**

1. New procedure issued 02/28/2020
THOR INDUSTRIES INC.

ENVIRONMENTAL PROCEDURE EMS 09
RELATIONS WITH REGULATORY AGENCIES

BACKGROUND

Working with regulatory agencies is critical to the success of each THOR Industries facility's environmental management program. Key elements of maintaining good relationships are ensuring that the facility complies with all applicable regulations, company policies, and procedures and recognizing that THOR Industries and the regulators have a common goal of protecting human health and the environment. This procedure provides guidance on interacting with regulatory agencies to respond to inspections and requests for information.

Almost all federal, state or local environmental statutes allow designated regulatory agencies to conduct inspections of subject facilities at "reasonable times," generally during normal operating hours. Regulatory agencies may schedule their inspections in advance (a week or a day ahead) to ensure that the appropriate person is available to escort them and respond to their questions or may appear at the plant on the day of inspection. Prompt attention to the inspector signifies the facility's appreciation of the importance of the inspector's visit and generally results in a more cordial inspection.

As in facility inspections, regulatory agencies derive the authority to request information from the respective environmental statutes. Three common reasons why regulatory agencies request information are:

- The facility applies for a permit and the agency requires additional data to issue that permit.
- During an inspection, the inspector notes deficiencies, issues a Notice of Violation (NOV) and requests the facility to submit information to refute the violation or to demonstrate that corrective actions have been taken.
- Upon review of existing information, the agency discovers that a facility may be operating without a permit or has not notified on certain of its operations.

Prompt response to information requests and NOVs and rapid initiation of corrective actions in many cases avoids expensive litigation and a subsequent poor public image for the Company.
GUIDANCE PLAN

Inspections

In anticipation of regulatory inspections, each THOR Industries facility should have the following procedures in place:

1. Identify environmental contacts to work with inspectors, normally the facility Environmental Manager.
   a. Identify primary and alternate contact(s).
   b. Provide names and phone numbers of primary and alternate contacts to the plant receptionist and to the plant manager's secretary.

2. When the inspector arrives at the facility, meet him/her promptly.
   a. Make every effort to welcome the inspector immediately.
   b. If this is the inspector's first visit to the facility, ask for his/her business card or other means of identification.
   c. Ensure that the inspector is aware of safety procedures and has the proper safety equipment to tour the site.

3. Understand the purpose of the inspection and propose an inspection agenda. For example, an air inspector will be interested in boilers, baghouses, and other air emission sources, a water inspector will want to review the wastewater treatment processes and wastewater discharges (outfalls), and a solid waste inspector will most likely ask to see the facility's hazardous waste generation points, the drum storage and underground storage tank areas.

4. If appropriate, review the facility's history, general layout and operations with the inspector.
   a. Use full-sized plot plans and process flow diagrams. Provide small plot plans and process flow diagrams (8½" x 11" or 11" x 17") to assist during the inspection.
   b. Aerial photos are also useful for discussions.

5. Accompany the inspector at all times during the inspection.
   a. Introduce the inspector to facility management and operations staff as you tour the facility, and state the purpose of the visit.
b. Be prepared to answer as many of the inspector's questions as possible, or to seek information for answers you don't know. This minimizes the need for the inspector to ask questions of plant personnel who may not be familiar with the processes or may not understand the purpose of the inspector's visit.

6. Make documents available for review, if specifically requested by the inspector.
   a. If the documents are confidential, obtain any needed approvals and confidentiality agreements before releasing the documents to the inspector.
   b. Provide space in a conference room or an empty office and bring all relevant documents to the inspector for review.
   c. If the inspector asks for copies of a few documents, honor that request on the day of the visit. If the inspector requests several voluminous documents, tell the inspector that you will honor the request within the next few days.
   d. If the inspector provides advance notice of the inspection, the plant environmental manager should anticipate the types of documents likely to be inspected, and ensure that these will be available on the day of inspection.

7. Request that the inspector share his/her findings before leaving the facility.
   a. Obtain a verbal report to ensure that the findings are accurate and to allow the environmental manager the opportunity to correct inaccurate findings and to begin correcting noted deficiencies.
   b. Request that the inspector send a copy of the written inspection report, completed after the visit.

8. Anticipate the regulatory agency's follow-up action.
   a. If the inspector has not noted any deficiencies, review the written report when received and maintain the report in an inspection file.
   b. If the inspector has noted deficiencies, immediately determine how and when these deficiencies can be corrected. Within a few days of the inspection visit, write him/her a follow-up letter explaining how you have corrected or plan to correct the deficiencies noted.
c. If the agency issues a Notice of Violation (NOV), notify the appropriate plant and Corporate environmental and management staff and formulate a response.

Requests for Information

Upon receiving a request for information from a federal, state, or local regulatory agency, the facility should do the following:

1. Give immediate attention to the request. Generally, agencies request responses in 15, 30 or 45 days. Make every effort to respond within the time frame requested. If the information request is extensive, call the person identified in the letter and request an extension. Confirm all conversations in writing.

2. Seek Corporate technical and/or legal assistance, if needed. If the facility environmental manager believes that the data requested is sensitive and could result in future regulatory scrutiny or enforcement, immediately consult Corporate Environmental staff.

3. Answer each question Thoroughly and carefully. All answers should be clear, concise, and factually correct. If questions are not clear, call the agency and request clarification.

4. Do not supply information beyond that which is requested. Do not try to answer unasked questions.

5. Summarize the data requested. Do not submit raw data unless specifically requested. Regulatory agencies can and will make determinations of compliance based on reduced data, unless they have reason to believe that a facility may not have submitted the correct information.

Revision History

1. New procedure issued 02/28/2020
THOR INDUSTRIES INC.

ENVIRONMENTAL MANAGEMENT SYSTEM NO. 10
UNDERGROUND STORAGE TANK MANAGEMENT

BACKGROUND

Regulations

<table>
<thead>
<tr>
<th>40 CFR Part</th>
<th>Subject</th>
</tr>
</thead>
<tbody>
<tr>
<td>280</td>
<td>UST Technical Standards and Corrective Action Requirements</td>
</tr>
<tr>
<td>281</td>
<td>State UST Programs</td>
</tr>
</tbody>
</table>

Applicability

The regulations apply to UST systems, which includes the tank and underground piping connected to the tank, where at least ten percent of the volume is underground. The regulations apply to USTs which store either petroleum or hazardous chemicals defined in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund) regulations.

Several types of tank systems are not USTs and are excluded from the regulations:

- Small farm and residential tanks (1,100 gallons or less) which store motor fuel for non-commercial purposes.
- Tanks which store heating oil for consumptive use on the premises where stored.
- Septic tanks and systems for collecting stormwater and wastewater.
- Tanks above the floor of underground areas, such as basements or tunnels.
- Flow-through process tanks.
- Tanks holding 110 gallons or less.
- Emergency spill and overfill tanks.
- Surface impoundments and pits.

General Requirements

1. **Design, Construction, Installation, and Notification** - contains performance standards for new UST systems and addresses upgrade of existing UST system to prevent releases due to structural failure, corrosion, spills, and overfills.
a. new tanks must be properly designed and constructed of fiberglass-reinforced plastic, (FRP), cathodically-protected steel, or steel-FRP composite

b. new UST piping must be properly designed, constructed, and protected from corrosion

c. new UST spill and overfill prevention equipment must prevent releases during product transfer

d. new UST installation must follow nationally-recognized codes and must be certified on the UST notification form

e. existing USTs may be upgraded by internal lining, cathodic protection, or a combination of the two specified in the rules

f. existing USTs must meet spill and overfill prevention standards for new USTs

2. **Spill and Overfill Prevention and Corrosion Protection** - required at installation for new tanks and piping, and for existing tanks installed before December 1988.

3. **Release Detection** – Owners and operators of petroleum USTs installed on or before April 11, 2016 must use at least one of these leak detection methods, or other methods approved by their implementing agency:

   a. **Interstitial Method**- Monitors are used to check the area between the tank and the barrier for leaks and alert the operator if a leak is suspected.

   b. **Internal Methods**- Automatic tank gauging, Manual tank gauging, Statistical Inventory reconciliation, Continuous in-tank leak detection.

   c. **External Methods**- Groundwater monitoring, vapor monitoring.

4. **Release Reporting** - if a UST system leak or release is discovered, federal regulations require:

   a. reporting to the implementing agency within 24 hours

   b. reporting to the National Response Center within 24 hours if leak from petroleum tank with capacity of 42,000 gallons or more affects navigable waters

   c. reporting to the appropriate local, state and federal agencies if a hazardous substance with a reportable quantity (RQ) under CERCLA
5. **Release Response and Corrective Action** - response includes several steps:

   a. initial response upon confirmation of release to mitigate release and associated hazards

   b. initial abatement and site check to prevent further release, continue to monitor associated hazards, remedy hazards, and provide initial remedy of contamination

   c. initial site characterization which addresses site conditions and nature of release

   d. free product removal to extent practicable to minimize spread of contamination

   e. investigations for soil and groundwater cleanup to determine full extent and location of contamination

   f. corrective action plan to respond to contaminated soils and groundwater

   g. public participation

6. **Closure** - regulations allow temporary closure for up to twelve months before permanent closure is required. Closure must follow regulations in 40 CFR 280, Subpart G, including:

   a. notification prior to closure, notification if evidence of release is discovered, and notification (in some cases) if evidence of groundwater impact is discovered

   b. removal of all liquids and sludge from tank

   c. tank removal or filling with inert material

   d. site assessment

   e. corrective action, if required, according to 40 CFR 280, Subpart F

   f. closure report and records maintenance for at least three years

7. **Financial Responsibility** - rules apply to owners or operators of petroleum USTs. Financial assurance is required to cover the costs of potential third-party liability and corrective action:
a. owners/operators at facilities engaged in petroleum production, refining or marketing, and owners/operators with an average monthly throughput of more than 10,000 gallons must obtain financial assurance of at least $1 million per occurrence.

b. owners/operators at facilities not engaged in petroleum production, refining or marketing, and owners/operators with an average monthly throughput of 10,000 gallons or less must obtain financial assurance of at least $500,000 per occurrence.

c. all owners/operators must maintain an annual aggregate of $1 million or $2 million, depending on the numbers of USTs assured.

d. the accepted financial mechanisms include insurance or risk retention group coverage, surety bond, guarantee, letter of credit, financial test of self-insurance, trust fund, a State-required mechanism, State fund, or other State assurance.

**GUIDANCE PLAN**

1. Each THOR Industries facility will operate existing Underground Storage Tanks (USTs) to:

   a. Prevent leaks and spills from all UST systems, including tanks, piping and associated equipment

   b. Detect and contain leaks and spills from all UST systems

   c. Remediate any problems created by UST system leaks and spills.

2. Each THOR facility will register USTs with the appropriate federal, state and/or local environmental agency (implementing agency). Registrations will be updated as conditions change, including temporary and permanent tank closures.

3. Each THOR facility will establish a definite need for each UST and consider aboveground tanks as an alternative. If the UST is not necessary to the facility operation, it should be properly decommissioned in accordance with local, state and federal rules and guidelines.

4. Each THOR facility will develop a testing program for each UST that remains in service. The tests are to be designed to verify the integrity of the UST. Each facility will contact state and local agencies with jurisdiction over the UST program and verify that planned testing programs meet their requirements. Any UST that fails the integrity test will be retested to verify whether the tank system is leaking if the
second test confirms that the tank is leaking, the UST will be repaired or
decommissioned in accordance with local, state and federal rules and guidelines.

5. Each THOR facility will meet or exceed standards for overfill and spill prevention,
leak detection, and corrosion protection. These systems will be compatible with the
tank and the surrounding equipment.

6. Each THOR facility will follow the spill and release reporting procedures required
by local, state and federal regulation and guidelines. Spill and release reporting is
addressed in THOR Environmental Management system No. 1, Environmental
Reporting.

7. Each THOR facility will obtain the appropriate financial assurance for corrective
actions and third-party liability.

Revision History

1.
THOR INDUSTRIES INC
ENVIRONMENTAL PROCEDURE EMS 11
Retention of Environmental Records

1) PURPOSE:

To provide a standard and effective method for retention of environmental records.

3) SCOPE:

This procedure applies to all THOR Industries Inc. manufacturing facilities, parts and service centers and THOR Corporate Environmental Affairs Department.

4) DEFINITIONS:

- Environmental Record: objective evidence of the extent of fulfillment of environmental requirements or the effectiveness of the operation of the environmental management system.
- Disposition: the form of disposal of records at the end of the overall retention period (e.g., shredding, erasure of computer data, etc.).
- Retention Period: the period for which the record is kept in current and archive status.
- Environmental Records Coordinator: one or more persons, assigned by the appropriate location/activity functional manager, who is/are responsible for environmental records management and administration of this procedure within a plant, business team, or similar organization. This responsibility may be distributed to each department head, or similar manager, if desired by the activity/site responsible manager, in lieu of having an Environmental Records Coordinator.

5) RESPONSIBILITY:

As described under PROCEDURE.

6) PROCEDURE:

<table>
<thead>
<tr>
<th>Step #</th>
<th>Responsibility</th>
<th>Procedure Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Operations Manager</td>
<td>Assign one or more Environmental Records Coordinators for the facility, plant, business team, or similar organizational sub-element.</td>
</tr>
<tr>
<td>2.</td>
<td>Env. Record Coordinator</td>
<td>Determine retention period and ultimate disposition mechanism of environmental records. The record retention requirements shall, at a minimum, meet the record retention requirements of all applicable laws, regulations and other requirements, such as</td>
</tr>
</tbody>
</table>
ISO14001 or QS-9000 guidelines. The established record retention periods should be equal to or longer than the schedule listed in Appendix A.

3. Env. Record Coordinator Environmental records relevant to lawsuits should be retained, in accordance with Legal Department’s instruction, beyond the normal retention schedule.

4. Env. Record Coordinator Ensure that facility environmental record retention schedule is incorporated as a subset of the facility overall record retention schedule.

5. Env. Record Coordinator Facilities may store inactive or less frequently referenced environmental records at off-site record storage facilities. Ensure that these records are stored and maintained in such a way that they are readily retrievable and protected against damage, deterioration or loss.

6. Env. Record Coordinator Facilities may choose to retain electronic image or photo image instead of paper records. Ensure that the legibility and traceability of these images are not compromised.

7) FORMS:

8) RECORDS:

9) REFERENCES:
   - QS-9000 Section I, Element 4.16
   - ISO 14001 Standard, Element 4.4.5 and 4.5.3

10) REVISION HISTORY:

<table>
<thead>
<tr>
<th>Revision No.</th>
<th>Effective Date</th>
<th>Description of Revision</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Appendix A : Environmental Record Retention Schedule

The following records should be maintained permanently:

1. Analysis of waste sent offsite for treatment or disposal
2. Annual waste disposal reports submitted to regulatory agencies
3. Audits concerning property transfers and risk assessment audit reports
4. Certificate of disposal or destruction from disposers
5. Changes to processes resulting in elimination of certain waste streams or in the generation or a different type of waste
6. Environmental insurance policies
7. Groundwater monitoring reports
8. Invoices for waste transportation and disposal
9. Invoices for repurchase of facility’s recycled waste materials
10. Notification to regulatory agencies of existence of underground storage tanks (UST), records of removal of underground storage tanks and closure activities conducted.
11. PCB annual inventory reports
12. Reclassification certification of equipment from PCB (polychlorinated biphenyl) to non-PCB status
13. Removal and/or replacement of asbestos materials
14. Waste manifests (hazardous and non-hazardous)

The following records should be maintained for at least 10 years after date on documents:

1. Contracts executed with waste transporters, recyclers, treaters or disposers
2. Discharge monitoring reports
3. Excess emission reports
4. Invoices or records showing costs of all pollution control equipment
5. PCB equipment inspection reports
6. Purchase orders with transporters and disposers of waste
7. Stack tests
8. Toxic release reports (Form R reports)
9. Underground storage tanks inventory and monitoring reports

The following permits should be maintained for at least 5 years after the subsequent permit is issued.

1. Permits from regulatory agencies for disposal of wastes at specific sites
2. Permits to install pollution control related equipment
3. Permits to operate

The following records should be maintained for at least 5 years after the issue has been resolved.

1. Notice of violations, consent orders, court rulings
2. Reportable spill incidents, reports to regulatory agencies and all actions taken to correct the problem

All environmental management system (ISO14001) related records should be maintained for at least 5 years, except environmental management system (EMS) audit report, which should be maintained by the facility for 5 years or 1 year after subsequent report is issued, whichever event occurs sooner.
## Appendix B: Recommended Environmental Record Disposition Mechanisms

<table>
<thead>
<tr>
<th>Types of Records</th>
<th>Disposition Mechanism</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Paper records</strong></td>
<td></td>
</tr>
<tr>
<td>- Records that contain confidential or proprietary information</td>
<td>Shredding then recycling</td>
</tr>
<tr>
<td>- Environmental agency inspections</td>
<td>Shredding then recycling</td>
</tr>
<tr>
<td>- Records that contain sensitive information</td>
<td>Shredding then recycling</td>
</tr>
<tr>
<td>- Other records, including public documents</td>
<td>Recycling</td>
</tr>
<tr>
<td><strong>Computer Data</strong></td>
<td></td>
</tr>
<tr>
<td>- Records on computer hard drives</td>
<td>Erase / encryption</td>
</tr>
<tr>
<td>- Records on external devices</td>
<td>Reformat/reuse or shredding</td>
</tr>
</tbody>
</table>
THOR INDUSTRIES INC.

ENVIRONMENTAL PROCEDURE NO. 12
POLLUTION PREVENTION

BACKGROUND

Pollution prevention is any practices that reduce or eliminate production of pollutants, prevent them from entering into any waste stream or being released into the environment prior to management techniques such as recycling, treatment or disposal. In 1990 Congress passed the Pollution Prevention Act. This Act refers to pollution prevention as a “national objective”, and establishes a hierarchy of environmental management priorities as national policy. The policy states that (a) pollution should be prevented or reduced at the source whenever feasible; (b) where pollution cannot be prevented it should be recycled in an environmentally safe manner; (c) in the absence of feasible prevention and recycling opportunities, pollution should be treated; and (d) disposal should be used only as a last resort.

THOR Industries recognizes the benefits of pollution prevention and is committed to pollution prevention practices. The THOR Industries Environmental Protection Policy requires us to “exercise innovation in our manufacturing processes and our end products to minimize or prevent the generation of waste and the discharge of contaminants into the environment.” In the THOR Industries Environmental Management Program, we are also committed to “minimize the volume and toxicity of wastes generated in our facilities. We will work with suppliers to obtain environmentally acceptable raw materials and will investigate and pursue process modifications which prevent pollution and result in waste reduction. We will implement internal recycling programs. We will vigorously pursue opportunities to recycle or reuse potential waste before considering other waste management practices. We will dispose of all wastes safely and responsibly.”

Applicability

Pollution prevention is the responsibility of all THOR Industries employees. Pollution prevention should be a key process at all THOR Industries manufacturing facilities. It should also be a key process at purchasing organization in obtaining environmentally acceptable raw materials and recycled materials; and the Environmental Affairs Department at THOR Corporate in implementing company-wide pollution prevention programs and monitoring the pollution prevention projects, efforts and results.

METHODS FOR MEASURING PROGRESS

To calculate the progress of each facility and the Company relative to the stated goals, several ground rules for measuring and calculating results were established:
1. Each facility establishes the production unit as a basis for its measurement of pollution generated or reduced. Examples of production units are: number of units produced at all recreational vehicle manufactures, tons of material processed at Postle Aluminum. The basic assumption is that the waste disposed, generated or toxic emissions released at each facility is directly proportional to the number of production units.

2. The amount of waste disposed, generated or the total amount of toxic materials released as reported on Form R are normalized by dividing total amount by the number of production units. Subsequent years' results are compared with the baseline year to determine reduction percentages for the facility.

3. Definitions:

Hazardous wastes are defined as wastes regulated as hazardous in respective regulations in U.S. Wastes designated for landfilling, incineration, or stabilizing before landfilling are considered as disposal. Waste streams that were processed to recover the useful material or energy are considered as recycling, provided that the waste streams contain the useful material or have enough heating values to be recovered for energy.

Waste materials generated at the facilities, with the exceptions of hazardous wastes, are considered non-hazardous wastes. Reduction of waste is divided into three categories:

- **reduce** - elimination of waste through raw material substitution, reduction of waste through process changes, reduce packaging or use of returnable containers
- **recycle or reuse** - includes recycling, conditioning and reuse, burning for heat value recovery
- **disposal** - landfilling, treatment such as stabilization prior to landfilling, incineration

Toxic Release Inventory (TRI) off-site releases are toxic fugitive or stack emissions, discharges to streams, underground injections, materials transferred to POTWs, and TSDFs (code# M40, M54, M61, M69, M72, M94 and M95) reported by facilities on Form R reports. TRI off-site recycling are materials recycled off-site (M20) or energy recovery (M56 and M92) reported on Form R reports. The sum of TRI releases and recycling represent TRI total releases.

4. Calculation Formula:

The following example represents the formulas and methods used to calculate waste reduction for any given year compared to the baseline year:
a. Waste disposed, baseline year

Waste disposed(base) = Waste generated - waste recycled/reused

Wb = Waste disposed (base) divided by Unit Production(base)

b. Waste disposed, current year (or any subsequent year thereafter)

Waste disposed(current) = Waste generated - waste recycled/reuse

Ws = Waste disposed(current or subsequent year) divided by Unit Production(current or subsequent year)

c. Percent reduction at a facility for a given subsequent year vs. the baseline year

Percent, Ps1 = ( Ws1 - Wb1 ) / ( Wb1 ) X 100

where Ps1 is the percent reduction at facility number 1 for a given subsequent year

Ws1 is the normalized (waste disposed/unit production) waste disposed in facility number 1 in given subsequent year

Wb1 is the normalized (waste disposed/unit production) waste disposed in facility number 1 in the baseline year

d. The total reduction percentage (PsT) for the whole Company, for any subsequent year, is calculated as follows:

Ps1(W1) + Ps2(W2) + Ps3(W3) +....

Percent, PsT = -------------------------------

W1 + W2 + W3 + .........

where Ps1, Ps2, Ps3 are percent reduction at facility 1, 2, 3, in a given subsequent year, as calculated in (c) above

W1, W2, W3 are the absolute amounts of waste disposed from facility 1, 2, 3 in the baseline year

W1 + W2 + W3 is the sum of the absolute amounts of waste disposed from all subject Company facilities in the baseline year

**GUIDANCE PLAN**
1. The THOR Industries pollution prevention practices should adhere to the following hierarchy: (a) source reduction; (b) reuse; (c) recycle; (d)treatment; (e) land disposal

2. Environmental coordinators at THOR Industries facilities and staff of Environmental Affairs Department at THOR Corporate are members of the THOR Industries Pollution Prevention Process Improvement Team. The mission of the Process team is to prevent or minimize the generation and/or release of wastes and pollutants at THOR Industries. The facilities are encouraged to establish pollution prevention teams (committees) to identify potential P2 opportunities and implement viable P2 projects.

3. Pollution prevention is a continuous improvement process. Facilities will establish facility specific pollution prevention goals. The facility goals will be compiled to calculate the corporate pollution prevention goals. The calculation formula is described in the General Requirements section of this procedure. Once the goals are reached, THOR Industries will establish new goals based on a more representative baseline year.

4. The pollution prevention results and goals are tracked on a normalized basis. Each facility will identify the appropriate “production unit” that is representative to the facility’s productions.

5. Facilities will submit monthly solid waste survey forms on the MOR reports, containing information related to the facility’s hazardous waste and non-hazardous waste generation and disposal activities. The waste survey forms are shown in Attachment 1. The facility will submit a copy of its Form R reports to the Director, Environmental Affairs at the same time the Form R reports are submitted to the regulatory agencies.

6. The Environmental Affairs Department at THOR Industries is responsible for tracking the corporate-wide pollution prevention results in relating to meeting the pollution prevention goals. The formula for calculating company-wide pollution prevention results based on facility data is shown in Section 4(d) of the General Requirement of this procedure.

Attachment 1:

Sustainability
<table>
<thead>
<tr>
<th>Recycling Commodity</th>
<th>FY 2020 - April 2020</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cardboard tons</td>
<td>0.00</td>
<td>Tons</td>
</tr>
<tr>
<td>Office Paper</td>
<td>0.00</td>
<td>Tons</td>
</tr>
<tr>
<td>Steel tons</td>
<td>0.00</td>
<td>Tons</td>
</tr>
<tr>
<td>Aluminum tons</td>
<td>0.00</td>
<td>Tons</td>
</tr>
<tr>
<td>Copper tons</td>
<td>0.00</td>
<td>Tons</td>
</tr>
<tr>
<td>Styrofoam Tons</td>
<td>0.00</td>
<td>Tons</td>
</tr>
<tr>
<td>Pallets quantity</td>
<td>0</td>
<td>Each</td>
</tr>
<tr>
<td>Plastic tons</td>
<td>0.00</td>
<td>Tons</td>
</tr>
<tr>
<td>Paints and Thinners gallons</td>
<td>0.00</td>
<td>Gal</td>
</tr>
<tr>
<td>Other Haz waste gallons</td>
<td>0.00</td>
<td>Gal</td>
</tr>
<tr>
<td>Oil gallons</td>
<td>0.00</td>
<td>Gal</td>
</tr>
<tr>
<td>Bulb recycle</td>
<td>0</td>
<td>Each</td>
</tr>
<tr>
<td>Total Landfill tons</td>
<td>0.00</td>
<td>Tons</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Energy Consumption</th>
<th>FY 2020 - April 2020</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electrical KWH consumed</td>
<td>0.00</td>
<td>KWH</td>
</tr>
<tr>
<td>Natural gas therms consumed</td>
<td>0.00</td>
<td>Therms</td>
</tr>
<tr>
<td>Total Water consumed</td>
<td>0.00</td>
<td>Gal</td>
</tr>
<tr>
<td>LP for fleet vehicles</td>
<td>-</td>
<td>Gal</td>
</tr>
<tr>
<td>Unleaded for fleet vehicles</td>
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<td>Gal.</td>
</tr>
<tr>
<td>Diesel for fleet vehicles</td>
<td></td>
<td>Gal.</td>
</tr>
<tr>
<td>Facility freon use: non-production</td>
<td>-</td>
<td>Lbs.</td>
</tr>
<tr>
<td>Consumable gases ie: CO2</td>
<td>-</td>
<td>CF</td>
</tr>
<tr>
<td>Purchase of renewable energy certificates</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
BACKGROUND

Federal Clean Air Act regulations establish permitting and operating requirements to limit emissions to the ambient air from manufacturing facilities. The Clean Air Act was most recently significantly amended in 1990. Key programs under the Act prior to 1990 are Prevention of Significant Deterioration (PSD) and Nonattainment, New Source Performance Standards (NSPS), and National Emissions Standards for Hazardous Air Pollutants (NESHAPs). The 1990 Clean Air Act strengthened the Nonattainment provisions and added titles on Air Toxics and federal permits.

Regulations

<table>
<thead>
<tr>
<th>40 CFR Part</th>
<th>Subject</th>
</tr>
</thead>
<tbody>
<tr>
<td>52</td>
<td>Prevention of Significant Deterioration (PSD)</td>
</tr>
<tr>
<td>60</td>
<td>New Source Performance Standards (NSPS)</td>
</tr>
<tr>
<td>61</td>
<td>National Emissions Standards for Hazardous Air Pollutants (NESHAPs)</td>
</tr>
</tbody>
</table>

Applicability and General Requirements

PSD regulations are designed to preserve air quality in regions that meet National Air Quality Standards (NAAQS) for the following pollutants:

- Carbon Monoxide
- Particulate Matter
- Nitrogen Oxides
- Ozone
- Sulfur Oxides
- Lead
In regions that exceed NAAQS standards (Nonattainment areas), states must develop and implement a State Implementation Plan (SIP) to lower emissions to acceptable levels through emissions offsets on new facility construction, limits on hours of operation, or other controls. The New Source Review program is an important element of getting a nonattainment area into compliance.

The NSPS regulate emissions from major new sources of emissions, such as boilers, volatile organic compound (VOC) process equipment, and VOC storage vessels.

NESHAPS regulate air pollutants such as asbestos, benzene, mercury, vinyl chloride, and other materials. The Clean Air Act of 1990 designates 187 Hazardous Air Pollutants (HAP). In addition, many states regulate toxic air contaminants and may require specific compliance actions on a case-by-case basis.

Federal and state permits and regulations may require spill and incident reporting. THOR Industries EMS No. 1 details spill and incident reporting requirements and procedures.

**GUIDANCE PLAN**

1. Facilities shall obtain construction and operating permits from appropriate federal, state, and/or local authorities or shall document reasons for exemptions from permitting requirements.

2. Permit applications and permit renewal applications will be completed, signed by authorized individuals in accordance with schedules established by the appropriate regulatory agency.

3. Facilities shall monitor process equipment vents and fugitive emissions as required by permits, NSPS or NESHAPs. Reports of monitoring results shall be submitted to the appropriate agencies as required.

4. Facilities shall operate in a manner that minimizes fugitive emissions of VOCs, for example:
   a. Keep drums of paints, solvents, and other volatile materials closed except when adding or removing the material.
   b. Operate paint spray booths under close supervision.
   c. Use high-solids paints where possible.

5. Facilities shall operate in a manner that minimizes nuisance air pollutants such as visible or odorous emissions.
6. Facilities shall report air emissions incidents or exceedances to the appropriate authorities as required, and to THOR Industries Corporate Environmental Affairs staff. The facility Environmental Coordinator or his designee shall document and investigate incidents or complaints regarding emissions from THOR Industries facilities and communicate findings to THOR Industries's Corporate Environmental Affairs department. A file of air emissions incidents and complaints shall be maintained onsite.

7. The Facility Environmental Coordinator or his designee shall accompany regulatory agency representatives on site visits.

8. Each THOR Industries facility shall periodically audit emissions points to:
   a. Ensure that applicable emissions points have the required permits.
   b. Check actual emissions against permitted emissions. This may be accomplished by calculations, testing, material balance or other methods.
   c. Meet any state requirements for emissions inventories under State Implementation Plans (SIPs).
   d. Check for applicability of any new requirements since the last audit.

Revision History

1. New procedure issued 02/28/2020
THOR INDUSTRIES INC.

ENVIRONMENTAL PROCEDURE NO. 14
WASTEWATER MANAGEMENT

BACKGROUND

The Clean Water Act (CWA), as amended by the Water Quality Act of 1987, regulates the discharge of process wastewater and stormwater. Three important CWA programs are National Pollutant Discharge Elimination System (NPDES) Permits, Pretreatment Standards, and Spill Prevention Control and Countermeasure (SPCC) Plans.

Regulations

<table>
<thead>
<tr>
<th>40 CFR Part</th>
<th>Subject</th>
</tr>
</thead>
<tbody>
<tr>
<td>112</td>
<td>Oil Pollution Prevention (SPCC Plan)</td>
</tr>
<tr>
<td>122</td>
<td>National Pollutant Discharge Elimination System (NPDES)</td>
</tr>
<tr>
<td>403</td>
<td>Pretreatment Standards</td>
</tr>
</tbody>
</table>

Applicability and General Requirements

NPDES Permits are required for direct discharges from point sources and from non-point stormwater discharges into navigable waters of the United States. NPDES Permits require written monthly Discharge Monitoring Reports (DMRs), as well as 24-hour oral and 5-day written reporting of any non-compliance which may endanger health or the environment. Regulations require reporting of other non-compliance when DMRs are submitted.

Effluent Guidelines developed under the NPDES program also contain restrictions on concentrations of pollutants allowed in discharges. Finally, Best Management Practices requirements may also apply if a facility uses, manufactures, stores, handles, or discharges designated hazardous or toxic pollutants.

Pretreatment Standards regulate discharges from point sources into publicly owned treatment works (i.e., municipal wastewater treatment plants).

SPCC Plans are required for facilities which have the potential to discharge oil into navigable waters of the United States. These plans must be maintained onsite, updated regularly, and made available to regulatory officials upon request.
Federal and state permits and regulations may require spill and incident reporting. THOR Industries Environmental Procedure No. 1 details spill and incident reporting requirements and procedures. THOR Industries Environmental Procedure No. 2 covers Spill Prevention, including SPCC Plans.

GUIDANCE PLAN

1. Each THOR Industries facility shall obtain and maintain onsite copies of pertinent wastewater discharge permits required by Federal, State, and/or local authorities.

2. Applications for renewal of Federal wastewater discharge permits will be completed, signed, and submitted to the appropriate agency at least 180 days prior to expiration of the existing permit. Applications for renewal of State and local permits will be filed in accordance with the respective agency's requirements.

3. Facilities shall develop and implement SPCC Plans as dictated by 40 CFR 112 or document the reasons why such plans are not needed. Plans shall be certified by a professional engineer, reviewed by facility management, and updated at least every three years or more often as changes in personnel or facilities occur.

4. Facilities shall monitor wastewater discharges as required by permits and, on a timely basis, report excursions to the proper authorities (oral, 24 hours; written, 5 days) and to THOR Industries Corporate Environmental Affairs staff. The causes of the excursions shall be corrected as quickly as practical and measures shall be implemented to prevent recurrences.

5. Facilities shall report any releases of hazardous substances to navigable waterways in excess of reportable quantities defined in 40 CFR 116 and 40 CFR 117 to the appropriate authorities (oral, 24 hours) and to THOR Industries Corporate Environmental Affairs staff.


7. The facility Environmental Coordinator or his designee shall accompany regulatory agency representatives on site visits. See THOR Industries Environmental Procedure No. 9, Relations with Regulatory Agencies.

8. Complaints regarding discharges from THOR Industries facilities shall be documented and thoroughly investigated by the facility Environmental Coordinator or his designee and communicated to THOR Industries's Corporate Environmental Affairs staff. A file of discharge incidents shall be maintained onsite.

9. Facilities shall operate oil/water separators in a manner that minimizes the potential for spills and overflows that could result in soil and/or groundwater contamination.
10. Facilities shall segregate contaminated and uncontaminated stormwater to minimize the amount of water to be treated.

Revision History

1. New procedure issued 03/02/2020
THOR INDUSTRIES INC.

ENVIRONMENTAL PROCEDURE NO. 15
ENVIRONMENTAL MANAGEMENT OF REAL ESTATE PROPERTIES

BACKGROUND

THOR Industries Inc desires to properly manage environmental risks associated with inactive, closed, divested sites, sites to be acquired and sites to be closed or sold. The objectives of this procedure are to minimize liabilities of the Company while protecting public health, welfare, natural and cultural resources and property.

Facilities which are no longer owned or operated by THOR Industries can represent a potential liability due to environmental, public image and legal issues associated with property transactions. Past operating practices, although commonly accepted and legal at the time the facilities were operating, may have adversely impacted the sites or surrounding environment and may eventually require remediation. THOR Industries may also be requested to assist in the remediation of sites which have been sold if the current owners are not financially able to carry out the remediation, or if a clear basis for allocating environmental liability was not established at the time of sale. THOR Industries, likewise, may face environmental liabilities if it buys contaminated property.

Regulations

The Toxic Substances Control Act (TSCA), Sections 8(c), 8(d), and 8(e)
40 CFR 717, Allegations of Significant Adverse Reactions (TSCA 8(c))
40 CFR 716, Health and Safety Data Reporting (TSCA 8(d))
Statement of Interpretation and Enforcement Policy, Notification of Substantial Risk, 43 FR 11110, March 16, 1978 (TSCA 8(c)).

Applicability

The CERCLA (Superfund) program impacts past or current owners or operators of sites that may have released hazardous substances to the environment. The SARA law supplements the original CERCLA Law. The Underground Storage Tank (UST) regulations under RCA and various provincial, state and local requirements apply to tank removals and to general site investigations and cleanup.

General Requirements

CERCLA regulates releases of hazardous substances to the environment, release prevention and cleanup of contamination. The UST regulations, detailed in THOR Industries Environmental Procedure No. 10, address release detection and reporting, release response, corrective action, closure and financial responsibility for USTs. Various provincial, state and local requirements set standards for site investigations, agency notifications and contamination cleanup.
GUIDANCE PLAN

1. THOR Industries’ Corporate Environmental Affairs Department shall ensure appropriate site reviews are conducted to determine the potential risks associated with inactive, closed and divested sites which are the subject of present or immediate potential real estate or other transactions. Site reviews shall also be conducted on sites to be acquired. Resources shall be allocated as needed to effectively manage the risks identified.

   a. Sites which are currently inactive, closed or divested and which are determined to present significant environmental and/or financial risks, shall be reviewed and their status updated as needed.

   b. Sites which are scheduled for shutdown, closure, or sale will be reviewed prior to finalizing the action.

   c. Sites which are to be acquired by the Company, in whole or in part, and sites which are going to be utilized as a sole source supplier to the Company, will be reviewed prior to finalizing the action.

   d. THOR Industries’ Corporate Legal and other THOR Industries departments involved and the environmental sensitivity of the surrounding area. Reviews may typically include the following evaluations:

2. The level of detail in the reviews may vary depending on the types of operations involved and the environmental sensitivity of the surrounding area. Reviews may typically include the following evaluations:

   a. Financial - to determine the viability of the current site owner or, in the case of a proposed sale, the prospective buyer.

   b. Insurance - to determine the extent to which THOR Industry may be insulated from financial impacts by prior or existing insurance policies.

   c. Legal - to determine the extent of protection provided by indemnifications, warranties, representations or other language in sales agreements.

   d. Public Information - to determine whether site is subject to investigation by regulatory authorities and to identify the type of information available in the public domain.

   e. Site Assessment (Phase 1) - to identify and evaluate environmental liabilities presented by the site. Site assessments may include the following:

       • Visual inspection and site photographs to assess the condition of the property.
• Interviews with key personnel, including past property owner(s), where possible.

• Review of pertinent documents related to environmental, health and safety issues.

• Review of regulatory status including review of site-specific and area-specific agency files, if appropriate.

• Review of historical aerial photos and chain-of-title.

f. Site Investigation (Phase 2) - preliminary evaluation of and cost estimates for remediation of areas of concern, if any, identified in Phase 1. Typical Phase 2 activities are:

• Sampling and analysis of soil, groundwater, surface water or other media, where indicated.

• UST integrity testing for tanks to remain in service.

• Asbestos surveys and polychlorinated biphenyls (PCBs) testing.

• Inventory of residual wastes, if any.

g. Remediation (Phase 3) - Implement cleanup and disposal activities, if required, before site disposition. Typical Phase 3 activities are:

• UST removal for inactive or leaking tanks

• Soil removal and disposal verification testing for contaminated areas and for UST excavations

• Waste oil tank or sump cleaning and removal

• Waste drum removal and offsite disposal

h. A report will be required at the conclusion of each of the 3 phases identified above. The Corporate Legal and Real Estate departments shall use, as appropriate, information in these reports for closing the transactions.

3. Contamination discovered during site investigation (Phase 2), especially if associated with underground storage tanks, need to be reported by site owner or operator to appropriate regulatory agencies. Cleanup plans usually needed to be approved by appropriate regulatory agencies prior to the conduct of remediation (Phase 3) activities. A closure report should document the assessment, investigation and remediation activities conducted at the site. The closure report is
generally prepared by the environmental consultant or contractor, if one is hired, or by facility personnel.

4. THOR Industry shall train operations and management personnel to detect and manage release from inactive waste disposal sites at operating locations to avoid future CERCLA liability.
THOR INDUSTRIES INC.
ENVIRONMENTAL PROCEDURE NO. 16
Inactive, Closed and Divested Sites

1.0 PURPOSE

To minimize potential risk and liabilities associated with inactive, closed and divested sites while protecting public health, welfare, natural and cultural resources and property. This procedure also describes THOR Industries processes in determining appropriate accrual in addressing THOR Industries potential environmental liabilities at these sites, and the process of evaluating potential public disclosure per applicable requirements referenced in Section 3.0.

2.0 SCOPE

All THOR Industries manufacturing operations past or current, and includes third party sites that may have released hazardous substances to the environment. This procedure also defines responsibilities of THOR Industries Environmental Affairs Department, Legal Department, Real Estate Department, Corporate Controller’s Office as they are core members of the “Superfund Accrual Process Team.”

3.0 REFERENCES/LINKAGES

- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund).
- Superfund Amendments and Reauthorization Act (SARA)
- US SEC Regulation S-K: Environmental Legal Proceedings Disclosure Requirements (FAS 5 and FIN 47)
- Financial Accounting Standards Board (FASB) Statement No. 143: Accounting for Asset Retirement Obligations
- Sarbanes Oxley Act
- ASTM 2001 Standard Guide (2173-01) for Disclosure of Environmental Liabilities

4.0 DEFINITIONS

Superfund, a popular name for the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980 requires that abandoned waste sites that present imminent hazard to human health and the environment be cleaned up. Individuals or companies who are identified as being responsible for treating, storing or disposing of hazardous materials at the site, also referred to as Potentially Responsible Parties (PRP), are targeted by the government to conduct and pay for the cleanup. Under Superfund, an individual who may have sent even a small amount of waste to a site could be liable for paying up to 100% of the cleanup, if no other PRPs are found who are financially viable.
In this procedure, Superfund sites include all sites that are being investigated, assessed or remediated under the CERCLA, or other regulatory authority, (such as RCRA, OPA), or state cleanup requirements or voluntary actions. The Superfund sites include three different categories:

a. Active sites: Sites that THOR Industries is actively involved in PRP activities such as investigations or cleanup,

b. Resolved sites: Sites THOR Industries has either bought out of as a de minimis party, or completed remedial requirements and has achieved successful closure, or THOR Industries has been determined to be a non PRP

c. Inactive sites: Sites THOR Industries has not been involved in, or has no activities or has not been contacted by the PRP group or the Federal and State EPA for over three years,

NCP –National Contingency Plan or NCP, is the federal government's blueprint for responding to both oil spills and hazardous substance releases. The intent is to develop the national response capability and promote overall coordination among the hierarchy of responders and contingency plans. Following the passage of Superfund legislation in 1980, the NCP was broadened to cover releases at hazardous waste sites.

Remedial Investigation/Feasibility Study (RI/FS) - Extensive technical studies conducted by the government or by PRPs to investigate the scope of contamination (RI) and determine the remedial alternatives (FS) which, consistent with the NCP, may be implemented at the site. An RI/FS may include a variety of onsite and offsite activities such as monitoring, sampling and analysis

Record of Decision (ROD) - The government publishes this document after completion of the RI/FS. The ROD identifies the remedial alternative chosen for implementation at a Superfund site. The ROD becomes part of the written administrative record. Judicial review of EPA cleanup decisions is generally limited to the administrative record

Remedial Design/Remedial Action (RD/RA) - Remedial design is a phase which follows the ROD and entering of the Consent Decree between government and PRPs to conduct remedial action. Remedial design includes development of engineering drawings and specifications for the site cleanup. Remedial action is the actual cleanup of the site

NFA/NFR – No further action or no further remediation letter from the regulatory agency reflects agency’s determination that no further work is necessary to clean up a site.

5.0 RESPONSIBILITY/ACCOUNTABILITY

As listed in Section 6.
6.0 ACTIONS

<table>
<thead>
<tr>
<th>Step #</th>
<th>Responsibility</th>
<th>Procedure Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Corporate Env. Affairs</td>
<td>THOR Industries Corporate Environmental Affairs Department shall, when necessary, ensure that site reviews are conducted to determine the potential risks associated with inactive, closed and divested sites and allocate resources as needed to effectively manage the risks:</td>
</tr>
<tr>
<td></td>
<td></td>
<td>a) Former Company manufacturing Sites which are currently inactive, closed or divested will be reviewed and their status will be updated quarterly. Other former company sites will be included in the review process, if determined by the Environmental Affairs Department that these sites can potentially result in significant environmental liabilities for Thor Industries.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>b) Sites which are scheduled for shutdown, closure, or sale will be reviewed prior to finalizing the action.</td>
</tr>
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<td></td>
<td>The level of detail in the reviews may vary depending on the types of operations involved and the environmental sensitivity of the surrounding area. Reviews will typically include the following evaluations:</td>
</tr>
<tr>
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<td></td>
<td>a) Financial - to determine the viability of the current site owner or, in the case of a proposed sale, the prospective buyer</td>
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<td>c) Legal - to determine the extent of protection provided by indemnifications, warranties, representations or other language in sales agreements.</td>
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<td>d) Public Information - to determine whether sites are subject to investigation by regulatory authorities and to identify the...</td>
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</table>
type of information available in the public domain.

e) Site Assessment (Phase 1) - to identify and evaluate environmental liabilities presented by the sites.

f) Site Investigation (Phase 2) - preliminary evaluation of and cost estimates for remediation of areas of concern identified in Phase 1.

g) Remediation (Phase 3) - Implement cleanup and disposal activities before site disposition

h) Closure – NFA or NFR

2. Corporate Real Estate

THOR Industries Corporate Real Estate Department shall notify the Environmental Affairs Department when property transactions are being contemplated.

3. Environmental Organization

THOR Industries environmental personnel shall arrange periodic inspection, maintenance, and release detection of company owned inactive waste disposal sites to avoid or minimize future potential CERCLA liability.

4. Superfund Accrual Process Team

Around the end of each fiscal quarter, the Superfund Accrual Process Team members shall review status and determine appropriate accrual amount for all third-party sites and formerly owned sites. The Team shall also review whether asset retirement obligations (ARO) have been evaluated for new purchases, development or installation of assets and such obligations have been appropriately and timely recorded. In addition, if a reasonable ARO estimate could not be made in the period the asset retirement obligation was incurred, whether new information is available to allow the liability to be recognized and recorded.

5. Superfund Accrual Process Team Leader

The Superfund Accrual Process Team Leader shall prepare and submit a report to the Finance organization on the accrual amount with a short summary of significant changes in site status and reasons to adjust the accrual amounts within five days after end of each fiscal quarter. Decision making
guidelines are included in Exhibit I. A sample quarterly report is shown in Exhibit II.

6. Finance Organization

The Finance Organization shall evaluate, on a quarterly basis, the need to adjust the environmental reserve which was set aside to address THOR Industries potential Superfund liabilities. The Finance Organization shall evaluate and determine the need for public disclosure of environmental events that are reasonably likely to have a material impact on the Company’s liquidity, capital resources, or operating results. The Finance Organization is also responsible for the timely recording of all ARO related entries on an ongoing basis until the liability is fully settled.

7.0 RECORDS/METRICS

All related documents must be filed and maintained in accordance with appropriate corporate record retention policies and procedures.

8.0 CHANGE REVISION

<table>
<thead>
<tr>
<th>Revision No.</th>
<th>Effective Date</th>
<th>Description of Revision</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>03/02/2020</td>
<td>New procedure</td>
</tr>
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</table>
Exhibit I – Superfund Accrual Guideline:

a) Currently, THOR Industries is not taking a discount rate to calculate the present value of future payments or liabilities. If and when THOR Industries decides to discount future expenditures, it will follow the following formula, in estimating the present value of specific Superfund liability:

\[
\text{PresentValue} = \sum \frac{\text{AnnualEstimatedAmount}}{(1 + R)^{(N + \frac{10.5}{24})}}
\]

Where \( R \) = Discount rate  
\( N \) = Number of years from the present

The 10.5/24 is added to the formula because the payments are expected to be evenly distributed (vs. payment on January 1 of each year)

b) The grand total for a site = present value amount + total paid amount on technical and legal expenses  
THOR Industries estimated costs = Technical paid to date + estimated technical cost over next several years except when remedial costs and/or allocations cannot be reasonably determined or estimated

c) The accrual for the current year reflects the amount estimated to be spent for the remaining quarters of the current year

d) Where a record of decision has been issued, the latest ROD estimate of site remediation expenditure will be considered

e) Where ROD is known, or the government / consultant has established the cost estimate, and the percentage of THOR Industries participation is documented, the amount will be considered in calculating THOR Industries potential exposure. An estimate of technical expenditures over the next five years will be projected and the balance reflected in the sixth year and beyond column

f) Where a ROD, or a cost estimate has been issued, but information from PRP group is available which indicates that USEPA may accept an alternative less costly remedy, consider lower cost remedy if it is anticipated that ROD will be amended to reflect lower cleanup cost

g) Where there is no ROD, obtain best cleanup estimates and estimated percentage of THOR Industries participation from existing THOR Industries files, and/or information available through participation in PRP steering group. These estimates will be considered in calculating potential THOR Industries exposures. There will be no attempt to capture all expenditures in the sixth year and beyond column, if the liabilities cannot be reasonably estimated

h) Where there is a ROD or a best estimate for cleanup available and a percentage of THOR Industries' participation is alleged, but the case is either in litigation or there is strong uncertainty of THOR Industries involvement, the staff attorney will estimate the likely potential exposure for THOR Industries based upon experience
1) **PROCEDURE NAME:**

Regulation Tracking

2) **PURPOSE:**

To establish and maintain an effective procedure to monitor, identify, understand, assess and communicate environmental, legal and other requirements to which THOR Industries subscribes, excluding mobile source requirements. This procedure supports conformance to ISO 14001 for Legal and Other Requirements.

3) **SCOPE:**

This procedure applies to all THOR Industries manufacturing operations, THOR Corporate offices, Parts and Service facilities and the Legal Department.

4) **DEFINITIONS:**

**Regulation Tracking Process:** (1) Monitoring and evaluating potential impacts to THOR Industries facilities of new, final or proposed federal, provincial, state and local environmental regulations. (2) Communicating to THOR Corporate offices and THOR Industries facilities, new, final or proposed environmental regulations that may have significant impacts to their operations, and (3) Action planning. See Appendix A: Regulation Tracking Process Flowchart.

**Action Planning** may include (a) working with environmental professionals at THOR Industries facilities and to issue compliance guidelines for new regulations that have major impacts to company operations; (b) assisting the potentially impacted facilities to establish a detailed, facility-specific compliance plan, which will identify resources and equipment needs, capital and operating costs, compliance timing and compliance plan implementation schedules, and; (c) submit comments on proposed regulations to applicable agencies, if appropriate.

**Other Requirements** may include but are not limited to (a) commitments, corporate-wide or facility-specific, associated with voluntary environmental programs (b) requirements associated with cleanup of THOR Industries’ previously owned sites (c) Superfund requirements for addressing third party sites and (d) corporate procedures which include requirements over and above regulatory requirements.

5) **RESPONSIBILITY:**

As described under **PROCEDURE**.

6) **PROCEDURE:**

<table>
<thead>
<tr>
<th>Step #</th>
<th>Responsibility</th>
<th>Procedure Action</th>
</tr>
</thead>
</table>

EMS 17
1. Applicable facilities

Each THOR Industries facility shall maintain a set of current federal, state, provincial, and local environmental regulations, and other requirements to which the facility subscribes, that are applicable to the environmental aspects of its activities, products and services. The facility may choose to access applicable environmental regulations on the Internet, if the regulations are available on the Internet and are kept updated. Each facility should maintain a schedule that identifies applicable compliance requirements and their specified frequency. See Appendix B: Example Compliance Schedule.

2. Regulation Tracking Process Team

For federal requirements, a Federal Regulation Tracking Process Team should be established. Members of this process team should include staff from THOR Corporate Environmental staff, Legal Department, and other selected environmental professionals from THOR Industries facilities. This team is responsible for implementing the Regulation Tracking Process for federal requirements.

3. Environmental Coordinator

For state, provincial and local requirements, the facility environmental coordinator is responsible for the Regulation Tracking Process.

4. All

Staff from the THOR Corporate Environmental Affairs Department and Law Department should, and the environmental professionals at THOR Industries facilities are encouraged to, monitor applicable environmental rules and proposed rules. Relevant information should be communicated to the Regulation Tracking Process Team leader(s).

5. All

THOR Corporate Environmental Affairs Department and environmental departments at THOR Industries manufacturing facilities are encouraged to subscribe to environmental newsletters, journals or magazines. Relevant information should be forwarded to Regulation Tracking Process Team leader(s).

7) FORMS:

There are no forms associated with this procedure.

8) RECORDS:

- Facility-Specific Compliance Plan
• THOR Industries’ Comments on Proposed Regulations

9) REFERENCES:
• ISO 14001, Section 4.3.2
• Environmental Reporter published by the Bureau of National Affairs, Inc.
• Appendix A: Regulation Tracking Process Flowchart
• Appendix B: Example Compliance Schedule

10) REVISION HISTORY:

<table>
<thead>
<tr>
<th>Revision No.</th>
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</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>03/11/2020</td>
<td>New Procedure</td>
</tr>
</tbody>
</table>
Appendix A: Regulation Tracking Process Flowchart

1. Monitor environmental regulations and other requirements
   - Attend seminars, training, or workshops
   - Review environmental magazines or journals
   - Participate in trade associations

2. Regulation update
   - Information exchange
     - Environmental conference call

3. Review applicability
   - Submit comments
   - Establish compliance plan
   - Monitor compliance
## Appendix B: Example Compliance Schedule

<table>
<thead>
<tr>
<th>Task</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review and/or Revise Air Permits</td>
<td>Annual / State</td>
</tr>
<tr>
<td>Review Water Permits and/or Record Water Usage</td>
<td>Annual</td>
</tr>
<tr>
<td>Monitor/Update Minimization Plan</td>
<td>Quarterly</td>
</tr>
<tr>
<td>Update Solid Waste Management Plan</td>
<td>Annual</td>
</tr>
<tr>
<td>Conduct Hazardous Waste Disposal Facility Audits</td>
<td>Annual</td>
</tr>
<tr>
<td>Review Contingency Plan</td>
<td>Annual</td>
</tr>
<tr>
<td>Bulk Storage Inspection</td>
<td>Weekly</td>
</tr>
<tr>
<td>Hazardous Waste Tank Inspection</td>
<td>Daily</td>
</tr>
<tr>
<td>Update Closure Plan</td>
<td>Annual</td>
</tr>
<tr>
<td>Hazardous Waste Generation Report</td>
<td>Annual / State</td>
</tr>
<tr>
<td>Hazardous Waste Generator Tax Report</td>
<td>Annual</td>
</tr>
<tr>
<td>Tier I or II Report</td>
<td>Annual</td>
</tr>
<tr>
<td>Form R Report</td>
<td>Annual</td>
</tr>
<tr>
<td>Update Special Waste Authorization Forms</td>
<td>Annual</td>
</tr>
<tr>
<td>Update Specification Waste Authorization For Non-Hazardous Disposal</td>
<td>Annual</td>
</tr>
<tr>
<td>Review and Update Process Flow Diagrams</td>
<td>Annual</td>
</tr>
<tr>
<td>Monitor In-Plant Compliance</td>
<td>Continuously</td>
</tr>
<tr>
<td>Monitor Disposal Facility Compliance</td>
<td>Bi-annual</td>
</tr>
<tr>
<td>Attend Workshops/Seminars, Etc.</td>
<td>Min. 20 hours training each year</td>
</tr>
<tr>
<td>Participate in Environmental Conference Calls</td>
<td>Monthly</td>
</tr>
<tr>
<td>Survey of Pollution Abatement Equipment</td>
<td>Annual</td>
</tr>
<tr>
<td>PCB Certificate of Exemption Renewal</td>
<td>5 Yr. / State</td>
</tr>
<tr>
<td>Hazardous Waste Disposal Facility Approval For Each Waste Stream</td>
<td>Annual</td>
</tr>
<tr>
<td>Report of Releases Into Environment</td>
<td>As Required</td>
</tr>
<tr>
<td>Monitor &amp; Report on Contact Water Discharges to Storm Sewer</td>
<td>Bi-monthly / City</td>
</tr>
<tr>
<td>Complete, Submit, and Track Hazardous Waste Manifests</td>
<td>As Required</td>
</tr>
<tr>
<td>Monitor Disposal Options and Adjust</td>
<td>Continuously</td>
</tr>
<tr>
<td>Update Training and Records for Personnel</td>
<td>Quarterly</td>
</tr>
<tr>
<td>Update Operation and Maintenance Manuals</td>
<td>Review Annually</td>
</tr>
<tr>
<td>Update Waste Analysis</td>
<td>Annual</td>
</tr>
<tr>
<td>Update/Perform PCB Inspection</td>
<td>Quarterly</td>
</tr>
<tr>
<td>PCB Report</td>
<td>Annual</td>
</tr>
<tr>
<td>Update Asbestos Abatement Activities</td>
<td>Annual</td>
</tr>
<tr>
<td>Review Underground Tank Reporting Requirements</td>
<td>Annual</td>
</tr>
<tr>
<td>Perform Equipment Calibration</td>
<td>Annual</td>
</tr>
<tr>
<td>Review Budget Requirements for Equipment Modification and Updating</td>
<td>Annual</td>
</tr>
<tr>
<td>Perform QA/QC of Facility Lab</td>
<td>Annual</td>
</tr>
<tr>
<td>Inspection and Documentation of Waste Storage Areas (Bulk &amp; Drum Storage)</td>
<td>Weekly</td>
</tr>
<tr>
<td>Collect and Analyze Waste Water Samples</td>
<td>As Required</td>
</tr>
<tr>
<td>SARA Reporting - Section 311</td>
<td>Within 3 Months of Addition</td>
</tr>
<tr>
<td>SARA Reporting - Section 312 (Tier II)</td>
<td>Annual</td>
</tr>
<tr>
<td>SARA Reporting - Section 313 (Form R)</td>
<td>Annual</td>
</tr>
<tr>
<td>Update Waste Profile for Disposal Facility</td>
<td>Annual</td>
</tr>
</tbody>
</table>
BACKGROUND

Product life cycle design is a critical element in achieving sustainable development. Sustainable Development is generally defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Sustainable development in a company is an overall process which results in products, facilities and operations being developed and operated in a manner leading to minimal environmental impact. Life cycle design seeks to conserve resources, prevent pollution, preserve diverse sustainable ecosystems, support environmental equity and maintain long-term viable economic systems. In life cycle design, products are defined as systems which include:

**The Product:** The product consists of all materials in the final product and all inputs in each life cycle stage are included. Complex products consist of a wide range of materials including a mix of primary (virgin) and secondary (recycled) materials.

**Processing steps by which products are made, used and retired:** Processing transforms materials and energy into a variety of intermediate and final products. This includes direct and indirect materials used to make a product. Resources consumed during research, development, testing and product use are included in processing.

**Distribution networks (packaging and transportation):** Distribution consists of packaging systems and transportation networks used to contain, protect and transport products and process materials. Transportation networks include trucks, drive away service and airlines. Wholesale and retail selling are included as part of the distribution system.
Regulations

RCRA - 40CFR 262 - Operator Standards
 - 40CFR 266 - Standards for Material Being Recycled/Revised
 - 40CFR 268 - Land Disposal Restrictions

CERCLA - 40CFR 355 - Emergency Planning & Notification
 - 40CFR 370 - Hazardous Chemical Reporting: Community Right To Know (SARA Title III)

CAAA - 40CFR 70 - Operating Permits

CWA - 40CFR 122 - National Pollutant Discharge Elimination System (NPDES)

1992 Energy Act

Applicability

Product life cycle applies to entire cycle from raw material through final disposal as discussed under background. Some of the more common Design For The Environment practices used by industry include:

Design for recyclability - ensuring both high recycled content in product materials and maximum recycling.

Design for separability and disassembly - simplifying product disassembly and material recovery.

Design for reusability - enabling certain components of a product to be recovered, refurbished and reused.

Design for remanufacture - enabling recovery of post-industrial or post-consumer waste for recycling as input to the manufacture of new products.

Design for disposability - assuring that all non-recyclable materials and components can be safely and efficiently disposed.

Material specifications - specify product materials that are superior in terms of increased recyclability, reduced energy content, increased life, reduced weight, etc.

Chemical use reduction - reducing or eliminating the types and amounts of undesirable substances that are either incorporated into the product or used in its manufacturing process.

Waste source reduction - reducing the mass of the product and/or its packaging, thus reducing the resulting quantity of waste matter per product unit.

Life extension - prolonging the useful life of a product or its components, thus reducing the associated waste stream.

Energy use reduction - reducing the energy required to manufacture, assemble, transport, store maintain, use, recycle or dispose of the product and its packaging.
General Requirements

Some of the key requirements for various business areas are highlighted in this section. This is not intended to cover in detail all possible considerations for optimum life cycle design. All business areas should consider other design for environmental practices discussed under applicability as appropriate for their role in the product life cycle.

1. Product Design and Development/Engineering

Optimum life cycle design will only occur with designs which are economically viable from a total cost standpoint.

Requirement to maintain our decades old approach of lowest cost of ownership design focus as a prime driver of good life cycle design.

Conducting life cycle environmental impact reviews in the product development platform process.

Important design considerations should include:

- material specifications which optimize recycling at product disposal stage with emphasis on plastics and interiors
- designs which are standardized resulting in fewer parts
- energy efficient designs in aerodynamic and vehicle configuration
- design and material specifications which minimize product weight
- use of components which can have cores remanufactured

2. Manufacturing

Specify processes which eliminate and/or minimize use of toxic and hazardous materials.

Optimize pollution prevention practices through use of EPA waste reduction hierarchy model.

Reduce energy use in facilities and manufacture of products.

3. Materials Management/Suppliers

Encourage suppliers to follow good environmental practices and particularly in the areas of pollution prevention, packaging and shipping of products, and shipping energy costs.

Involve suppliers in product life cycle design practices during joint development of products with THOR companies.
4. **Distribution of Product and Parts**

   Minimize transportation energy costs for products and parts.
   
   Optimize packaging and shipping materials through reduced packaging and reusable shipping containers.

5. **Parts and Service**

   Provide availability of service parts and product service requirements.
   
   Promote sale of remanufactured components.

6. **Dealers**

   Maintain customer parts and service functions.
   
   Support sale of remanufactured components and collection of component cores.
   
   Use appropriate disposal practices during product operating life and end of product life cycle.

**GUIDANCE PLAN**

All business areas are involved in various elements of product life cycle design from raw material to final disposal. Successful implementation of product life cycle design at THOR Industries requires support from all areas using appropriate practices. Good life cycle design is driven by economically viable practices and will benefit customers, suppliers and THOR.
THOR INDUSTRIES INC.

ENVIRONMENTAL PROCEDURE NO. 19
TOXIC SUBSTANCES CONTROL ACT

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THOR INDUSTRIES INC

ENVIRONMENTAL PROCEDURE NO. 19
TOXIC SUBSTANCES CONTROL ACT REQUIREMENTS

Background

Regulations

The Toxic Substances Control Act (TSCA):
19 CFR 12 U.S. Customs Service - Chemical Substances
40 CFR 707 Chemical Imports and Exports (TSCA 13)
40 CFR 704 Comprehensive Assessment Information Rule (CAIR) (TSCA 8(a))
40 CFR 712 Preliminary Assessment Information Rule (PAIR) (TSCA 8(a))
40 CFR 717 Allegations of Significant Adverse Reactions (TSCA 8(c))
40 CFR 716 Health and Safety Data Reporting (TSCA 8(d))

Statement of Interpretation and Enforcement Policy, Notification of Substantial Risk, 43 FR 11110, March 16, 1978 (TSCA 8(e))

Applicability

The Toxic Substances Control Act (TSCA) passed in 1976 was aimed primarily at manufacturers of toxic chemical substances and mixtures.

The TSCA requirements apply differently to manufacturers, processors, distributors or end users. Several TSCA sections impact THOR Industries operations as they fall into the following categories:

Manufacturer Any activity resulting in a chemical reaction which forms a new chemical different from the starting raw materials is considered manufacturing. THOR Industries will be considered to be a manufacturer if our facilities' processes involve chemical reactions, or THOR Industries imports chemical substances or articles containing chemical substances.
Processor  Mixing or processing chemicals which are incorporated as part of a product sold in commerce. (e.g., applying paint to an RV, adding oil to engines and repackaging chemicals)

User  Using chemicals or mixtures without distributing them as part of a product is considered to be an end use. Examples include cleaning solvents and paint solvents which are evaporated or recovered from the process and do not remain as a reaction product or impurity.

THOR Industries Compliance Plan

Each THOR Industries manufacturing facility will designate a TSCA coordinator to implement this procedure.

Manager, Environmental Affairs and Manager, Occupational Health and Safety are the designated TSCA Corporate Coordinators.

The THOR Industries TSCA coordinators are responsible for the implementation of this procedure. They will conduct necessary TSCA trainings, and perform ongoing assessment of TSCA compliance status at all applicable THOR Industries facilities.

The THOR Industries TSCA Coordinators shall implement an annual TSCA review process to ensure that all applicable TSCA requirements are fully implemented and complied with at all THOR Industries operations.

SECTIONS 4 & 5
Notification and Testing

Requirements

EPA requires manufacturers (importers) to provide information to EPA on new chemicals prior to manufacture. EPA also may require reporting on existing chemicals prior to significant new uses if there is insufficient data on the health or environmental effects of these chemicals. EPA may also require manufacturers and processors to perform tests on specific chemical substances where more information is needed.
THOR Industries Compliance Plan

THOR Industries will require our chemical suppliers to certify that their chemical substances comply with all TSCA rules and orders.

Before importing chemical substances, **THOR Industries** will require our suppliers to certify that the chemical substances comply with all TSCA rules and orders. The certification should be included in the entry documentation for all shipments.

Before producing or importing chemical substances, the TSCA coordinator at the facility will confirm that the substances are listed in the TSCA Inventory. If not, the Corporate Environmental Department and the Corporate Health and Safety Department should consult with the Legal Department to determine if Premanufacture Notices (PMNs) are required.

**SECTION 8(a)**

Preliminary Assessment Information Rule (PAIR) and Comprehensive Assessment Information Rule (CAIR)

Requirements

EPA has promulgated two sets of rules under Section 8(a), both of which are currently in effect. The first is the Preliminary Assessment Information Rule (PAIR) which requires *manufacturers and importers* of certain priority listed chemicals to report manufacturing and production information. Although still in effect, PAIR will eventually be replaced by the Comprehensive Assessment Information Rule (CAIR) which covers more chemicals and also covers *processors* and requires more detailed information on production volumes, worker exposure, environmental releases and financial data.

THOR Industries Compliance Plan

Each THOR Industries U.S. manufacturing facility will review the EPA list for TSCA 8(a) chemicals to determine if any of the chemicals are now or have been present at the site. Manager, Environmental Affairs, one of the Corporate TSCA Coordinators will provide a copy of the updated list to all manufacturing facilities periodically. The Corporate TSCA Coordinators will provide advice and counsel to the operations manager if reporting of information maybe necessary.
SECTION 8(c)
Records and Reports of Allegations that Chemical Substances Cause Significant Adverse Reactions

Requirements

1. The EPA defines significant adverse reactions as reactions that may indicate a substantial impairment of normal activities, or long-lasting or irreversible damage to health or the environment. For occupational health effects, OSHA recordability may be a good indication of significance. To comply with Section 8(c), manufacturers, processors and distributors who do repackaging or other processing of chemical substances and mixtures must:
   a. Keep records of significant adverse reactions to health or the environment alleged to have been caused by a chemical substance or mixture.
   b. Permit inspection and submit copies of such records, upon request of any designated representative of the Administrator.

2. To invoke the duty to record, an allegation must implicate one or more chemical substances manufactured or processed by THOR Industries or a THOR Industries process or operation, as the cause of the significant adverse reaction. The allegation must specifically identify a chemical substance or mixture, an article containing a specific substance, a company process or operation in which specific substances are involved, or an emission or other discharge related to the manufacture, processing, or distribution in commerce of a specific chemical substance.

3. Allegations may be made by any person, including employees of THOR Industries, customers, plant neighbors, contractors, other firms on behalf of their employees, and organizations on behalf of their members. Allegations should be in writing and Section 8(c) regulations permit companies to require that allegations be written.

4. Examples of reactions adverse to human health that are to be considered "significant" and must be recorded are:
   a. Long-lasting or irreversible damage, such as cancer or birth defects.
   b. Partial or complete impairment of bodily functions, such as reproductive, neurological disorders or blood disorders.
c. Impairment of normal activities experienced by all or most of a group of persons exposed at one time to a substance.

d. An impairment of normal activities experienced each time an individual is exposed to a substance.

5. Allegations of adverse human health effects are exempt from recordkeeping if the alleged reaction is a known human effect. A human health effect is known if it is described in published scientific literature, product labeling or material safety data sheets. However, the exemption of a known human effect does not apply if the effect was more toxic than described; had previously been observed in animals but not in humans; or occurred over a shorter exposure period, at a lower exposure level, or by a different route than previously described.

6. Environmental effect allegations must be recorded if they involve:

a. Abnormal numbers of animal or plant deaths.

b. Reduction of reproductive success or vigor of a species.

c. Reduction in agricultural productivity, whether of crops or livestock.

d. Long-lasting or irreversible contamination of components of the environment, especially groundwater, surface water or soil.

e. Gradual or sudden changes in the composition of animal or plant life, including fungal or microbial organisms in an area.

7. Allegations of environmental reactions are exempt from TSCA Section 8(c) recordkeeping if they are a direct result of an accidental spill, discharge, emission or incident which has been reported to the EPA or other federal agency under requirements of any regulation.

THOR Industries Compliance Plan

1. The THOR Industries facility TSCA Coordinator shall manage TSCA Section 8(c) procedures and information. The Coordinator may request assistance from other THOR Industries staff members who are able to evaluate allegations data, if needed.
2. Certain THOR Industries employees are more likely to receive allegations and must be especially alert. Receptionists who answer outside telephone calls and sales personnel are likely first contacts for formal and informal information from customers, neighbors, etc., in the course of normal business. Medical and insurance personnel need to be able to recognize information derived from employees during physical examinations, office visits, insurance claims, etc., that implicate a chemical exposure. Legal personnel can become aware of allegations that should be evaluated when they receive complaints or as a result of the filing of a legal action.

3. THOR Industries program requires that allegations must be written. If for any reason the person making the allegation is unable or unwilling to put it in writing, other employee, a supervisor or the nurse, for example, should transcribe the allegation in written form and ask the allegor to sign the document. The allegations should be submitted to the facility TSCA coordinator, even if the allegor will not sign it.

The facility TSCA coordinator shall review allegations against information on the SDS and shall determine if they are significant. If so, they shall be referred to the Corporate TSCA Coordinators.

4. The THOR Industries Corporate TSCA Coordinators shall establish a secure records system for TSCA allegations documentation at the THOR Industries headquarters. Each file will contain:

a. The original allegation as received.

b. An abstract of the allegation and other pertinent information:

   • The name and address of the facility that received the allegation.

   • The date the allegation was received at the facility.

   • The implicated substance, mixture, article, company process or operation, or site discharge.

   • A description of the allegor (e.g., "company employee," "plant neighbor," "individual consumer"). If the allegation involves a health effect, the sex and year of birth of the individual should be recorded if ascertainable.

   • A description of the alleged health effect(s). The description must relate how the effect(s) became
known and the route of exposure, if explained in the allegation.

- A description of the nature of the alleged environmental effect(s), identifying the affected plant and/or animal species, or contaminated portion of the physical environment.

c. The results of any self-initiated investigation of an allegation (the EPA does not require an investigation).

d. Copies of any further required records or reports (e.g., OSHA Form 101).

5. Records must be retrievable by the alleged cause of the illness, injury or environmental contamination, such as: 1) a specific chemical identity, 2) a mixture, 3) an article, 4) a company process or operation, or 5) a site emission, effluent or other discharge. If records are filed according to location of the allegation, a cross reference system is a way of being able to retrieve records by alleged cause.

Records of worker-related allegations, either by a THOR Industries or a customer's employee, are retained for at least 30 years. All other allegations are retained for at least five years.
1. EPA may require manufacturers, importers and processors of chemical substances, mixtures or chemical categories to submit lists and copies of health and safety studies on specifically listed chemicals or mixtures. The agency adds to the listing periodically and occasionally issues requests for additional reporting.

2. The EPA defines health and safety study as any study of any effect of a chemical substance or mixture on health or the environment or on both, including underlying data and epidemiological studies, studies of occupational exposure to a chemical substance or mixture, toxicological, clinical, and ecological or other studies of a chemical substance or mixture, and any test performed under TSCA.

3. The agency intends that submitters of a "health and safety study" will apply the terms to include a broad spectrum of tests and other data. The regulations include these examples:
   a. Long- and short-term animal tests.
   b. Tests for ecological or other environmental effects on invertebrates, fish, or other animals and plants.
   c. Assessments of human and environmental exposure, including workplace exposure, and impacts of a particular chemical substance or mixture on the environment, including surveys, tests, and studies.
   d. Monitoring data, when they have been aggregated and analyzed to measure the exposure of humans or the environment to a chemical substance or mixture.

THOR Industries Compliance Plan

Manager, Environmental Affairs, one of the Corporate TSCA Coordinator will periodically provide a current copy of the list to each facility. Each THOR Industries facility will review the EPA list for TSCA Section 8(d) chemicals to determine if any of the chemicals are now or have been present at the site. If reporting of studies is a possibility, the facility TSCA coordinator will inform and assist the Corporate TSCA coordinator in submitting such studies.

The facility TSCA coordinator should inform Manager, Occupational Health & Safety, one of the Corporate TSCA coordinators, on all health and safety studies conducted or future studies to be conducted at the facility.

SECTION 8 (e)
Substantial Risk Information
Requirements

1. Under Section 8(e), a manufacturer, importer, processor, or distributor, who obtains information which reasonably supports the conclusion that a substance or mixture presents a substantial risk of injury to health or the environment shall inform the Administrator of the information within 15 working days unless the person has actual knowledge that the Administrator has been adequately informed of the information. Substantial risk includes both the seriousness of the effect and the probability of its occurrence.

2. The agency has listed effects that require substantial risk reporting. The human health effects are:
   a. Any instance of cancer, birth defects, mutagenicity, death, or serious or prolonged incapacity, including the loss of or inability to use a normal bodily function with a consequent relatively serious impairment of normal activities, if one or a few chemical(s) is strongly implicated.
   b. Any pattern of effects or evidence which reasonably supports the conclusion that the chemical substance or mixture can produce cancer, mutation, birth defects or toxic effects resulting in death, or serious or prolonged incapacitation.

3. The environmental effects that require Section 8(e) reporting are:
   a. Widespread and previously unsuspected distribution in environmental media, as indicated in studies (excluding materials contained within appropriate disposal facilities).
   b. Pronounced bioaccumulation. Measurements and indicators of pronounced bioaccumulation heretofore unknown to the Administrator should be reported when coupled with potential for widespread exposure and any non-trivial adverse effect.
   c. Any non-trivial adverse effect, heretofore unknown to the Administrator, associated with a chemical known to have bioaccumulated to a pronounced degree or to be widespread in environmental media.
   d. Ecologically significant changes in species' interrelationships; that is, changes in population behavior, growth, survival, etc., that in turn affect other species' behavior, growth, or survival.
4. Any emergency incident of environmental contamination is also to be reported if it:
   a. Seriously threatens humans with cancer, birth defects, mutation, death, or serious or prolonged incapacitation.
   b. Seriously threatens non-human organisms with large-scale or ecologically significant population destruction.

5. Information does not need to be reported if it:
   a. Has been published by EPA in reports.
   b. Has been submitted in writing to EPA pursuant to mandatory reporting requirements under TSCA or any other authority administered by EPA.
   c. Has been published in the scientific literature and referenced by specified abstract services.

**THOR Industries Compliance Plan**

1. Any information received that could be included in the Section 8(c) or Section 8(e) requirements must be handled in a timely manner, and the evaluation process must proceed without delay to at least determine if the Section 8(e) criteria are met.

2. The THOR Industries procedure for handling allegations of significant effects will be used to evaluate effects which meet the criteria for reporting under Section 8(e). The THOR Industries Corporate TSCA Coordinators should work closely with facility TSCA coordinators and determine if a significant risk reporting is appropriate.

3. THOR Industries will submit information which reasonably supports the conclusion that a substance or mixture presents a substantial risk of injury to health or the environment to EPA within 30 working days.
1.0 PURPOSE
The purpose of this corporate procedure is to define the approval process for introduction, use and change of chemical substances, materials, and certain parts, prior to use in THOR Industries plants. THOR Industries must meet all federal, state, provincial and local guidelines for these materials and substances.

2.0 SCOPE
This procedure applies to all THOR Industries employees, and those working on behalf of THOR Industries, in North America. This procedure will be expanded to other countries as their requirements necessitate and compliance details identified.

3.0 REFERENCES
OSHA standard 29CFR-1910.1200
40 CFR EPA standards for air, water, and waste emissions
EP06 (Community Right To Know Planning)
REL-PROC-PR-002.4, Update a Release
EDS-A13 – Approved Nouns for Use as Drawing Titles

4.0 DEFINITIONS
MSDS – Material Safety Data Sheet. An MSDS (also referred to as an SDS, or safety data sheet) is a document provided by a manufacturer containing data regarding the properties of a particular substance. A manufacturer is required by governmental agencies to provide an MSDS upon request.

Originator – the person who first intends to specify, order, use, or supply a chemical type material identified in the criteria below and initiates the MSDS approval request. (synonyms: originator, requester, initiator.)
**Product or Technical data sheet** – a data sheet describing material specifications but not an agency or government approved material safety data sheet. Such data sheets cannot be used in lieu of MSDS.

**Environmental data sheet (EDS)** – a data sheet describing environmental specifications but not an OSHA approved material safety data sheet. Such data sheets cannot be used in lieu of MSDS. Some facilities may require an EDS which can be requested of the material manufacturer.

**Material** – the substance or substances of which a thing is made or composed, (synonyms: substance.) Also refer to the Criteria 1 and 2 below and EDS-A13 Noun codes.

**Substance** – a physical material from which something is made or has discrete existence. (synonym: material) Also refer to the Criteria 1 and 2 below and EDS-A13 Noun codes.

### 5.0 PROCEDURE

Form EMS 20 must be completed when both criteria 1) and criteria 2) in this procedure are met.

**Criteria 1)** One or more of these following situations apply:

- Purchasing or Specifying new product or material / substance
- New or different application (e.g. brush vs. spray) or location (e.g. department, building) in the Plant of a material / substance
- Use by a Plant that has not previously approved this material / substance.
- Sourcing change (e.g. new Vendor or Manufacturer)
- Product name change, or
- ANY formulation change or additive.

**Criteria 2)** Materials / substances that fall within the requirements of this procedure:

- In addition to parts, any direct or indirect materials that are of a chemical nature, such as solvents, liquids, cleaners, water treatment chemicals, janitorial, etc. If an MSDS exists for the material, this procedure is applicable.
- Process materials / substances that may release hazardous materials, (solid, liquid, mist or vapor/gas). Examples include cutting, grinding, torching, heating, or other processes that can generate dust, hazardous off-gas, or release a coating on a part, (processing steel, cutting or heating parts with coatings or oils.)
- Abrasive materials, such as saw blades, grinding wheels.
- Supplier-furnished kits that include any of parts, materials / substances that falls within two bullets above.
MSDS:

MSDS should be furnished to the THOR Industries approving plants with the Request for Product Approval, EMS 20. The MSDS is available from the intended vendor or direct from the manufacturer as required by law. An explanation and example of an MSDS is at the end of this procedure.

Approval / Rejection time:

The time required for approval / rejection decision depends on the type of material / substance. Normal approval time is one to two weeks. The decision could take more than 6 months if the approver determines an environmental permit from a government agency is needed.

A rejection means that the material / substance cannot be used by the THOR Industries plant and cannot be purchased or brought into the Plant. A non-approved use could lead to significant penalties for THOR Industries and jeopardize continued operations.

6.0 RESPONSIBILITIES

- The originator (often Purchasing, Engineering, or Manufacturing Engineer) is responsible for determining if this procedure applies to the change being considered, initiating the request form, collecting the MSDS and necessary information, and submitting to the applicable approvers on Form EMS20.
- Managers, (often Purchasing and Engineering) are responsible to ensure that their team members follow this procedure.
- Approvers are responsible to coordinate site approval minimally involving environmental, safety, and fire concerns. Distribution to site affected parties, such as Planning, is recommended.
- Approvers (often EHS Coordinators) are responsible to respond in a timely manner with an approval or rejection to the originator and documenting reasons for rejection.
- Purchasing and Engineering are responsible to cascade the requirements of this procedure to the vendor and supplier.
- Corporate Compliance is responsible for auditing the implementation of this procedure.

7.0 STEPS

The originator completes Request for Product Approval Form EMS 20 for EACH product being considered when above criteria are met and collects and attaches the necessary information (e.g. MSDS, EDS) to the completed request form.

The originator mails, faxes, or e-mail the collected information to all the EHS coordinators identified on the completed form EMS 20.

The THOR Industries Parts EHS coordinator always receives a copy of the Request Form and MSDS.
EHS coordinators at the effected THOR Industries plants return the completed form to the originator.

Once the originator receives return approval by all the identified approvers on EMS 20, the originator should file the approved Request for Product Approval and accompanying MSDS forms in accordance with appropriate records retention.

Minimum information for an MSDS (SDS)

<table>
<thead>
<tr>
<th></th>
<th><strong>Identification of the substance or mixture and of the supplier</strong></th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>• Product identifier.</td>
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<tr>
<td></td>
<td>• Other means of identification.</td>
</tr>
<tr>
<td></td>
<td>• Recommended use of the chemical and restrictions on use.</td>
</tr>
<tr>
<td></td>
<td>• Supplier's details (including name, address, phone number, etc.).</td>
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<tr>
<td></td>
<td>• Emergency phone number.</td>
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</tbody>
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<table>
<thead>
<tr>
<th></th>
<th><strong>Hazards identification</strong></th>
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<tbody>
<tr>
<td>2</td>
<td>• Hazard classification of the substance/mixture.</td>
</tr>
<tr>
<td></td>
<td>• Label elements, including precautionary statements.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th><strong>Composition/information on ingredients</strong></th>
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<tbody>
<tr>
<td>3</td>
<td><strong>Substance</strong></td>
</tr>
<tr>
<td></td>
<td>• Chemical identity.</td>
</tr>
<tr>
<td></td>
<td>• Common name, synonyms, etc.</td>
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<tr>
<td></td>
<td>• CAS number, EC number, etc.</td>
</tr>
<tr>
<td></td>
<td>• Impurities and stabilizing additives which contribute to the classification of the substance.</td>
</tr>
<tr>
<td></td>
<td><strong>Mixture</strong></td>
</tr>
<tr>
<td></td>
<td>• The chemical identity and concentration or concentration ranges of all ingredients which are hazardous.</td>
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</table>

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<thead>
<tr>
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<th><strong>First aid measures</strong></th>
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<tr>
<td>4</td>
<td>• Description of necessary measures, subdivided according to the different routes of exposure, i.e., inhalation, skin and eye contact, and ingestion.</td>
</tr>
<tr>
<td></td>
<td>• Most important symptoms/effects, acute and delayed.</td>
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<tr>
<td></td>
<td>• Indication of immediate medical attention and special treatment needed, if necessary.</td>
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</tbody>
</table>

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<thead>
<tr>
<th></th>
<th><strong>Firefighting measures</strong></th>
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<tbody>
<tr>
<td>5</td>
<td>• Suitable (and unsuitable) extinguishing media.</td>
</tr>
<tr>
<td></td>
<td>• Specific hazards arising from the chemical (e.g., nature of any hazardous combustion products).</td>
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<tr>
<td></td>
<td>• Special protective equipment and precautions for firefighters.</td>
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</tbody>
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<tr>
<th></th>
<th><strong>Accidental release measures</strong></th>
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<tr>
<td>6</td>
<td>• Personal precautions, protective equipment and emergency procedures.</td>
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<tr>
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</tbody>
</table>
| **7. Handling and storage** | **•** Precautions for safe handling.  
**•** Conditions for safe storage, including any incompatibilities. |
| **8. Exposure controls/personal protection.** | **•** Control parameters, e.g., occupational exposure limit values or biological limit values.  
**•** Appropriate engineering controls.  
**•** Individual protection measures, such as personal protective equipment. |
| **9. Physical and chemical properties** | **•** Appearance (physical state, color, etc.).  
**•** Odor.  
**•** Odor threshold.  
**•** pH.  
**•** melting point/freezing point.  
**•** initial boiling point and boiling range.  
**•** flash point.  
**•** evaporation rate.  
**•** flammability (solid, gas).  
**•** upper/lower flammability or explosive limits.  
**•** vapor pressure.  
**•** vapor density.  
**•** relative density.  
**•** solubility(ies).  
**•** partition coefficient: n-octanol/water.  
**•** autoignition temperature.  
**•** decomposition temperature. |
| **10. Stability and reactivity** | **•** Chemical stability.  
**•** Possibility of hazardous reactions.  
**•** Conditions to avoid (e.g., static discharge, shock or vibration).  
**•** Incompatible materials.  
**•** Hazardous decomposition products. |
| **11. Toxicological information** | Concise but complete and comprehensible description of the various toxicological (health) effects and the available data used to identify those effects, including:  
**•** information on the likely routes of exposure (inhalation, ingestion, skin and eye contact);  
**•** Symptoms related to the physical, chemical and toxicological characteristics;  
**•** Delayed and immediate effects and also chronic effects from short- and long-term exposure;  
**•** Numerical measures of toxicity (such as acute toxicity estimates). |
12. Ecological information
   • Ecotoxicity (aquatic and terrestrial, where available).
   • Persistence and degradability.
   • Bioaccumulative potential.
   • Mobility in soil.
   • Other adverse effects.

13. Disposal considerations
   • Description of waste residues and information on their safe handling and methods of disposal, including the disposal of any contaminated packaging.

14. Transport information
   • UN Number.
   • UN Proper shipping name.
   • Transport Hazard class(es).
   • Packing group, if applicable.
   • Marine pollutant (Yes/No).
   • Special precautions which a user needs to be aware of or needs to comply with in connection with transport or conveyance either within or outside their premises.

15. Regulatory information
   • Safety, health and environmental regulations specific for the product in question.

16. Other information including information on preparation and revision of the MSDS (SDS)

8.0 RECORDS
Completed EMS 20 with applicable EHS signatures and attached MSDS.

EXAMPLE MATERIAL SAFETY DATA SHEET (MSDS or SDS):
METHYL ETHYL KETONE

1. Product Identification

Synonyms: 2-Butanone; ethyl methyl ketone; MEK; Methyl acetone
CAS No.: 78-93-3
Molecular Weight: 72.11
Chemical Formula: CH₃COCH₂CH₃
Product Codes:
J.T. Baker: 5385, 9214, 9319, 9323, 9414, Q531
Mallinckrodt: 6206, 6233, 6240, 6243

2. Composition/Information on Ingredients

<table>
<thead>
<tr>
<th>Ingredient</th>
<th>CAS No</th>
<th>Percent</th>
<th>Hazardous</th>
</tr>
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<tbody>
<tr>
<td>Methyl Ethyl Ketone</td>
<td>78-93-3</td>
<td>99 - 100%</td>
<td>Yes</td>
</tr>
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</table>

3. Hazards Identification

Emergency Overview

DANGER! EXTREMELY FLAMMABLE LIQUID AND VAPOR. VAPOR MAY CAUSE FLASH FIRE. HARMFUL OR FATAL IF SWALLOWED. HARMFUL IF INHALED OR ABSORBED THROUGH SKIN. AFFECTS CENTRAL NERVOUS SYSTEM. CAUSES IRRITATION TO SKIN, EYES AND RESPIRATORY TRACT.

SAF-T-DATA™ Ratings (Provided here for your convenience)
Health Rating: 2 - Moderate (Life)
Flammability Rating: 3 - Severe (Flammable)
Reactivity Rating: 1 - Slight
Contact Rating: 2 - Moderate
Lab Protective Equip: GOGGLES & SHIELD; LAB COAT & APRON; VENT HOOD; PROPER GLOVES; CLASS B EXTINGUISHER
Storage Color Code: Red (Flammable)

Potential Health Effects

Inhalation:
Causes irritation to the nose and throat. Concentrations above the TLV may cause headache, dizziness, nausea, shortness of breath, and vomiting. Higher concentrations may cause central nervous system depression and unconsciousness.

Ingestion:
May produce abdominal pain, nausea. Aspiration into lungs can produce severe lung damage and is a medical emergency. Other symptoms expected to parallel inhalation.

Skin Contact:
Causes irritation to skin. Symptoms include redness, itching, and pain. May be absorbed through the skin with possible systemic effects.

Eye Contact:
Vapors are irritating to the eyes. Splashes can produce painful irritation and eye damage.

Chronic Exposure:
Prolonged skin contact may defat the skin and produce dermatitis. Chronic exposure may cause central nervous system effects.

Aggravation of Pre-existing Conditions:
Persons with pre-existing skin disorders or eye problems or impaired respiratory function may be more susceptible to the effects of the substance.

4. First Aid Measures

Inhalation:
Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention.

Ingestion:
Aspiration hazard. If swallowed, vomiting may occur spontaneously, but DO NOT INDUCE. If vomiting occurs, keep head below hips to prevent aspiration into lungs. Never give anything by mouth to an unconscious person. Call a physician immediately.

Skin Contact:
Immediately flush skin with plenty of soap and water for at least 15 minutes while removing contaminated clothing and shoes. Get medical attention. Wash clothing before reuse. Thoroughly clean shoes before reuse.
**Eye Contact:**
Immediately flush eyes with plenty of water for at least 15 minutes, lifting upper and lower eyelids occasionally. Get medical attention.

---

5. Fire Fighting Measures

**Fire:**
- Flash point: -9°C (16°F) CC
- Autoignition temperature: 404°C (759°F)
- Flammable limits in air % by volume:
  - lel: 1.4;uel: 11.4
- Extremely Flammable.

**Explosion:**
Above flash point, vapor-air mixtures are explosive within flammable limits noted above. Vapors can flow along surfaces to distant ignition source and flash back. Contact with strong oxidizers may cause fire. Sealed containers may rupture when heated. Sensitive to static discharge.

**Fire Extinguishing Media:**
Dry chemical, foam or carbon dioxide. Water spray may be used to keep fire exposed containers cool, dilute spills to nonflammable mixtures, protect personnel attempting to stop leak and disperse vapors.

**Special Information:**
In the event of a fire, wear full protective clothing and NIOSH-approved self-contained breathing apparatus with full facepiece operated in the pressure demand or other positive pressure mode. This highly flammable liquid must be kept from sparks, open flame, hot surfaces, and all sources of heat and ignition.

---

6. Accidental Release Measures

Ventilate area of leak or spill. Remove all sources of ignition. Wear appropriate personal protective equipment as specified in Section 8. Isolate hazard area. Keep unnecessary and unprotected personnel from entering. Contain and recover liquid when possible. Use non-sparking tools and equipment. Collect liquid in an appropriate container or absorb with an inert material (e.g., vermiculite, dry sand, earth), and place in a chemical waste container. Do not use combustible materials, such as saw dust. Do not flush to sewer! If a leak or spill has not ignited, use water spray to disperse the vapors, to protect personnel attempting to stop leak, and to flush spills away from exposures. US Regulations (CERCLA) require reporting spills and releases to soil, water and air in excess of reportable quantities. The toll free number for the US Coast Guard National Response Center is (800) 424-8802.

J. T. Baker SOLUSORB® solvent adsorbent is recommended for spills of this product.

---

7. Handling and Storage
Protect against physical damage. Store in a cool, dry well-ventilated location, away from any area where the fire hazard may be acute. Outside or detached storage is preferred. Separate from incompatibles. Containers should be bonded and grounded for transfers to avoid static sparks. Storage and use areas should be No Smoking areas. Use non-sparking type tools and equipment, including explosion proof ventilation. Containers of this material may be hazardous when empty since they retain product residues (vapors, liquid); observe all warnings and precautions listed for the product.

8. Exposure Controls/Personal Protection

Airborne Exposure Limits:

- OSHA Permissible Exposure Limit (PEL):
  200 ppm (TWA)

- ACGIH Threshold Limit Value (TLV):
  200 ppm (TWA), 300 ppm (STEL)

Ventilation System:
A system of local and/or general exhaust is recommended to keep employee exposures below the Airborne Exposure Limits. Local exhaust ventilation is generally preferred because it can control the emissions of the contaminant at its source, preventing dispersion of it into the general work area. Please refer to the ACGIH document, Industrial Ventilation, A Manual of Recommended Practices, most recent edition, for details. Use explosion-proof equipment.

Personal Respirators (NIOSH Approved):
If the exposure limit is exceeded and engineering controls are not feasible, a full facepiece respirator with organic vapor cartridge may be worn up to 50 times the exposure limit or the maximum use concentration specified by the appropriate regulatory agency or respirator supplier, whichever is lowest. For emergencies or instances where the exposure levels are not known, use a full-facepiece positive-pressure, air-supplied respirator. WARNING: Air purifying respirators do not protect workers in oxygen-deficient atmospheres.

Skin Protection:
Wear impervious protective clothing, including boots, gloves, lab coat, apron or coveralls, as appropriate, to prevent skin contact. Butyl rubber is a suitable material for personal protective equipment.

Eye Protection:
Use chemical safety goggles and/or a full face shield where splashing is possible. Maintain eye wash fountain and quick-drench facilities in work area.

9. Physical and Chemical Properties

Appearance:
Clear, colorless liquid.

Odor:
Sharp mint-like odor.

Solubility:
29 g in 100 g of water.

Specific Gravity:
0.81 @ 20C/4C

**pH:**
No information found.

**% Volatiles by volume @ 21C (70F):**
100

**Boiling Point:**
80C (176F)

**Melting Point:**
-86C (-123F)

**Vapor Density (Air=1):**
2.5

**Vapor Pressure (mm Hg):**
78 @ 20C (68F)

**Evaporation Rate (BuAc=1):**
2.7 (Ether = 1)

---

10. Stability and Reactivity

**Stability:**
Stable under ordinary conditions of use and storage.

**Hazardous Decomposition Products:**
Carbon dioxide and carbon monoxide may form when heated to decomposition.

**Hazardous Polymerization:**
Will not occur.

**Incompatibilities:**
Oxidizing materials, caustics, amines, ammonia, strong bases, chloroform, chlorosulfonic acid, oleum, potassium-t-butoxide, heat or flame, hydrogen peroxide, nitric acid. Can attack many plastics, resins and rubber.

**Conditions to Avoid:**
Heat, flames, ignition sources and incompatibles.

---

11. Toxicological Information

**Toxicological Data:**
Oral rat LD50: 2737 mg/kg; inhalation rat LC50: 23,500 mg/m3/8-hr; skin rabbit LD50: 6480 mg/kg; investigated as a mutagen, reproductive effector.

**Reproductive Toxicity:**
Has shown teratogenic effects in laboratory animals.

---------\(\text{Cancer Lists}\)---------

\begin{tabular}{|l|l|l|l|}
\hline
Ingredient & Known & Anticipated & IARC Category \\
\hline
Methyl Ethyl Ketone (78-93-3) & No & No & None \\
\hline
\end{tabular}
12. Ecological Information

**Environmental Fate:**
When released into the soil, this material may leach into groundwater. When released into the soil, this material may evaporate to a moderate extent. When released into water, this material may biodegrade to a moderate extent. When released into water, this material may evaporate to a moderate extent. When released into water, this material is expected to have a half-life between 10 and 30 days. This material is not expected to significantly bioaccumulate. When released into the air, this material is expected to be readily degraded by reaction with photochemically produced hydroxyl radicals. When released into the air, this material is expected to have a half-life between 1 and 10 days.

**Environmental Toxicity:**
This material is not expected to be toxic to aquatic life. The LC50/96-hour values for fish are over 100 mg/l.

13. Disposal Considerations
Whatever cannot be saved for recovery or recycling should be handled as hazardous waste and sent to a RCRA approved incinerator or disposed in a RCRA approved waste facility. Processing, use or contamination of this product may change the waste management options. State and local disposal regulations may differ from federal disposal regulations. Dispose of container and unused contents in accordance with federal, state and local requirements.

14. Transport Information

**Domestic (Land, D.O.T.)**

| Proper Shipping Name: ETHYL METHYL KETONE |
|---|---|
| Hazard Class: 3 |
| UN/NA: UN1193 |
| Packing Group: II |

**Information reported for product/size:** 366LB

**International (Water, I.M.O.)**

| Proper Shipping Name: ETHYL METHYL KETONE |
|---|---|
| Hazard Class: 3 |
| UN/NA: UN1193 |
| Packing Group: II |

**Information reported for product/size:** 366LB

15. Regulatory Information

F, Xi
R11 - Highly flammable
R36 - Irritating to eyes
R66 - Repeated exposure may cause skin drying or cracking
R67 - Vapours may cause drowsiness or dizziness
S2 - Keep out of the reach of children
S9 - Keep container in a well-ventilated place
S16 - Keep away from sources of ignition - No smoking

---(Chemical Inventory Status - Part 1)---

<table>
<thead>
<tr>
<th>Ingredient</th>
<th>TSCA</th>
<th>EC</th>
<th>Japan</th>
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---(Chemical Inventory Status - Part 2)---

---(Canada)---

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---(Federal, State & International Regulations - Part 1)---

---(SARA 302)---

<table>
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---(Federal, State & International Regulations - Part 2)---

---(RCRA)---

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<td>U159</td>
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</table>

Chemical Weapons Convention: No TSCA 12(b): No CDTA: Yes
SARA 311/312: Acute: Yes Chronic: Yes Fire: Yes Pressure: No
Reactivity: No (Pure / Liquid)

Australian Hazchem Code: 2[Y]E
Poison Schedule: S5
WHMIS:
This MSDS has been prepared according to the hazard criteria of the Controlled Products Regulations (CPR) and the MSDS contains all of the information required by the CPR.

16. Other Information
NFPA Ratings: Health: 1 Flammability: 3 Reactivity: 0
Label Hazard Warning:
DANGER! EXTREMELY FLAMMABLE LIQUID AND VAPOR. VAPOR MAY CAUSE FLASH FIRE. HARMFUL OR FATAL IF SWALLOWED. HARMFUL IF INHALED OR ABSORBED THROUGH SKIN. AFFECTS CENTRAL NERVOUS SYSTEM. CAUSES IRRITATION TO SKIN, EYES AND RESPIRATORY TRACT.
Label Precautions:
Keep away from heat, sparks and flame.
Keep container closed.
Use only with adequate ventilation.
Wash thoroughly after handling.
Avoid breathing vapor.
Avoid contact with eyes, skin and clothing.

**Label First Aid:**
Aspiration hazard. If swallowed, vomiting may occur spontaneously, but DO NOT INDUCE. If vomiting occurs, keep head below hips to prevent aspiration into lungs. Never give anything by mouth to an unconscious person. In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Wash clothing before reuse. If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. In all cases, get medical attention.

**Product Use:**
Laboratory Reagent.

**Revision Information:**
MSDS Section(s) changed since last revision of document include: 3, 15.

**Disclaimer:**
**********************************************************************************
***********
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Prepared by: Environmental Health & Safety
Phone Number: (314) 654-1600 (U.S.A.)
THOR INDUSTRIES INC
ENVIRONMENTAL PROCEDURE NO. 20
New or Changed Chemical Approval Form

REQUEST FOR PRODUCT APPROVAL - The associated SDS must be attached to this completed request.

TO: Environmental Coordinator and Safety Manager (1 copy each)

Site Environmental Coordinator

Site Safety Manager

FROM: To be completed by Originator/Requestor (Note incomplete requests cannot be evaluated.)

<table>
<thead>
<tr>
<th>Originator Name:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
<tr>
<td>Department:</td>
<td>Mail Location:</td>
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<tr>
<td>Telephone:</td>
<td>E-mail:</td>
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</table>

SECTION 1
To be completed by Originator/Requestor (Note incomplete requests cannot be evaluated.)

Trade Name/Chemical Name of Product: ________________________________
Supplier ______________________ Manufacturer Name: ____________________________
Product Application:

a) What is it to be used for? ____________________________________________

b) Why do we need it? __________________________________________________________________________

c) Approval Request is: New Chemical □ New Formulation □ New Name/Vender □ New Location □ Contractor Use □ Other (Describe) □

   d) Type of Use? Permanent □ If Permanent, Daily Production □ Maintenance □ Janitorial □ OR Trial □ Temporary Use □, Describe non-permanent (start/end dates, quantity, etc.)

e) How is it to be applied? Brush □ Spray □ Wipe □ Robot/Auto □ Poured □ Used in Closed System □ Other (Describe) □

f) Applied to what substrate? Metal □ Plastic □ Wood □ Other (Describe) □

g) Where will be used within the Facility? (Dept/Area/Process/Booth) __________________________

h) What product is it replacing? (Part# & Manufacturer & Vendor) __________________________


j) Container Type/Size __________________________ Maximum Amount to be Stored On-site
   Tote □ Drum □ Bulk (Implies on-site Tank needed) □ Plastic □ Steel □ Fiber or pallet □
   Is Container a vendor: Returnable □ OR Non-Returnable □

k) Additional Comments/Information: __________________________
**SECTION 2**

To be filled out by Site Environmental Coordinator

<table>
<thead>
<tr>
<th>Originator Name:</th>
<th>Date:</th>
</tr>
</thead>
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<table>
<thead>
<tr>
<th>Trade Name or Chemical Name of Product (from Page1):</th>
<th>COMMENTS (Required if Rejected*)</th>
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<tbody>
<tr>
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Approver Review:       Accept ☐    Reject ☐  ___________________________

Approver Signature:
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________
____________________________________________________________________

SIGN   PRINT   FACILITY REPRESENTED

Phone ____________  Date ________________

RETURN COMPLETED REQUEST TO ORIGINATOR UPON REVIEW DETERMINATION

Notification to Originator: ___E-mail ___ Mail ______ Other (Describe)  Initial and Date Return Notification ________