



Environmental Management System (EMS) Manual

Company Overview

Badger Corrugating Company is a family and employee owned company, that is currently in its fifth generation of family ownership. In 1903, Badger was a fabricator of metal products, and distributed products for the heating and building trades. Over the past 120 years, Badger has evolved into a full-line distributor of interior and exterior millwork, cabinets and building products for residential and commercial projects. Badger has its own fleet of delivery vehicles that run scheduled routes each week in Wisconsin, Minnesota, Iowa and Illinois.

To further our commitment to our customers, compliance obligations and the environment, Badger makes the following promise/pledge to:

Policy - Top Management shall define the organization's environmental policy and ensure that, within the defined scope of its environmental management system, it:

- a) Is appropriate to the nature, scale and environmental impacts of its activities, products, and services,
- b) Includes a commitment to continual improvement and prevention of pollution,
- c) Includes a commitment to comply with applicable legal requirements and with other requirements to which the organization subscribes which relate to its environmental aspects,
- d) Provides the framework for setting and reviewing environmental objectives and targets,
- e) Is documented, implemented, and maintained,
- f) Is communicated to all persons working for or on behalf of the organization, and
- g) Is available to the public.

Green Tier - Adoption of an **environmental policy** that includes a commitment to compliance with environmental requirements, pollution prevention, and continual improvement in environmental performance and that is available to the public.

We offer the Badger Customer Experience through **innovation**, **driven** by a **collaborative**, **responsive** and **dedicated** team.





Community Impact/Engagement

Badger is a strong advocate for giving back to our communities. Badger's principle owners, Brian and Melissa Mlsna, along with senior leadership and other team members, participate in opportunities annually that allow Badger to give back to our communities. Opportunities include, but are not limited to:

- Steppin' Out in Pink – Gundersen Health System's annual walk to raise funds for breast cancer research - Sponsor Award winner since 2015.
- LADCO's Diamond Recognition Award winner for Leadership, Quality, Innovation, Expansion and Job Creation.
- Donated a truck load of water to communities in Iowa hit by a Derecho in December 2021.
- Donated building materials for the completion of a home in La Crescent, Minnesota – son had cancer.
- Weiser Park, La Crescent, Minnesota – donated close to \$20,000 to upgrade city park.
- La Crosse Area Builders Association (LABA) – Tools for Schools donation(s) annually.
- Toys for Tots – Employer and employee donations during the Christmas holiday season.
- Habitat for Humanity – In-kind contribution to help support and provide families with a place to call home.
- Other miscellaneous donations in response to natural disasters in our communities.



Executive Summary

Badger is in its first year of certification under the Wisconsin DNR Green Tier I program. This document constitutes Badger's implementation of the EMS utilizing a functional equivalent EMS.

In concert with the Malfunction Prevention and Abatement Plans which provides guidance for daily controls and monitoring of Badger's air pollution control equipment, Badger has established goals to continually reduce air emissions and add equipment and technology to improve and control the output of production materials in the Millwork division. The following represents steps that have already been taken to jump start the Environmental Goals and Objectives listed below.

Pre-2024 Objectives

Water-Based Products

Reduce volatile organic compounds (VOC) levels in the Millwork Prefinish area through the use of water-based products. Badger has been completely water-based since September 2023. Through the use of improved technology, products and equipment we will continue to see a decrease in VOC emissions.

- Reduce or eliminate short and long-term adverse health risks associated with VOC emissions by 90%.

Manometers

Booth manometers are inspected and condition documented at the beginning of each shift to ensure proper operation and is recorded on the daily manometer readings and filter inspection forms. Data forms are collected at the end of each month and retained in the DNR folder.

- Recalibrated at least twice per year.
- Daily manometer readings and filter inspections are logged daily – data reviewed by Quality Specialist to ensure booth is operating appropriately.
- Ensure filter media is properly in place and/or changed as needed.
- Continually examine the types of filters being used and recommend product changes to improve compliance and overall safety of Millwork team members.

Air Velocity Testing

In February 2023, a new process was implemented to improve the monitoring of air velocity at the face of booths, robot work envelopes, and at filter locations. The purpose is to ensure that air velocity at the openings is at 100 linear fpm or higher. If air velocity drops below 100 linear fpm, equipment will be evaluated and filters will be reviewed for potential changeout. If air velocity cannot be maintained at 100 linear fpm, the booth or robot work areas will be shut down until repair is completed.

- Paperless system – recordings entered via tablet twice daily for immediate electronic access to data.



- Data monitored daily by supervisor and/or quality specialist to ensure air velocity is at or above 100 linear fpm. Action will be taken if that is not the case.
- Evaluate filters to ensure they meet needs and standards for appropriate air velocity.
- Air velocity equipment recalibrated annually.

New Equipment

- New drying ovens – flatline and standalone – reduce dry time to improve packaging and ship times to customers.
- Robotics – increase efficiencies and consistency in how paint and stain products are applied to doors and other millwork products.
- Lift Stations – reduce and/or eliminate injuries associated with lifting doors.
- Sander – increase door capacities.

Safety Programs

In addition to OSHA required trainings (i.e., PPE, Respirator Fit testing, hearing, electrical, emergency procedures, fire safety, lock out tag out, machine guarding, hazardous communication, etc.), Badger has established additional opportunities to continually improve the overall safety and wellbeing of employees in the Millwork division. In 2023, a new Health Hazards-PPE training, specific to employees working in Prefinish, was implemented. All new employees assigned to the Prefinish area participate in one-on-one training of the Health Hazards-PPE training and conducted annually in a group “huddle” format.

- Director of HR, Compliance and Safety reviews and implements, on at least an annual basis, new training opportunities to reduce and/or eliminate overall risks associated with working in Millwork production areas.

Environmental Goals and Objectives

- 1. Reduce facility energy by installing new doors and replace convection ovens with infrared ovens.**

Measurement – Chart monthly heating bills against 2023 baseline.

- 2. Reduce facility coating waste by 5%.**

- Airless tips
- New filters that need to be changed less.

Measurement – Track annual disposal of coating waste through Hydrite against 2023 baseline.



3. Achieve consecutive years being 100% water-based coatings facility.

Measurement – No solvent based products used for coatings processes. Only cleaning products will contain a solvent based component.

4. Become a very small waste generator within 2 years.

Measurement – Chart monthly usage and emissions, particulates released, and totals at a glance. Monitored on a monthly basis.