

Attachment 3: MEGTEC Systems has consciously worked to reduce hazardous waste by taking three significant steps. The result of these steps is that MEGTEC Systems has improved its status from (as defined by EPA) a Large Quantity Generator to a Small Quantity Generator. The three steps include:

- 1) Elimination of an entire hazardous waste stream of aerosol cans. Formerly, aerosol cans were disposed into collection drums by any user when finished with the task at hand. The drums were then disposed as hazardous waste. The new procedure requires the cans to be restocked if there is any remaining useable paint, and punctured (with residual paint collected as hazardous waste and aerosol propellant collected in a charcoal filter) only after they are completely spent. This has eliminated in excess of 40 55-gallon drums of aerosol can hazardous waste a year. As an added bonus, the punctured cans are crushed and deposited with MEGTEC Systems' scrap metal recycler for use in steel production.
- 2) Modified the procedure for cleaning paint guns with the resultant reduction by 75% of the remaining primary hazardous waste stream. Formerly, the painters would clean the guns after each coat. This would involve a discharge of solvent through the paint guns into a collection pail until the solvent flow had no appearance of paint solid. In the new procedure, painters switch from primer coat to finish coat at the completion of the primer coat, allowing the finish coat to "chase" the primer through the guns and onto the product, then discharge only enough solvent into the collection pails to remove the bulk of the paint solids; the remainder of the solvent is returned to the solvent supply container for reuse. The solvent, laden with paint solids, is distilled to reuse the solvent, and the still bottoms are the hazardous waste. This has resulted in a reduction from approximately 600 pounds of hazardous waste generated a week to approximately 600 pounds of hazardous waste generated a month.
- 3) Virtual elimination of a waste stream of customer coatings. Formerly, the Pilot Coater Laboratory operation would accept remaining unused coatings from customers after a trial run. The coatings were of use to the customer, but not to MEGTEC Systems, and hence would become hazardous (if solvent-based) or non-hazardous (if water-based) waste. By strengthening the wording in the contracts for use of the Pilot Coater Laboratory, MEGTEC Systems was able to encourage virtually all customers to remove their remaining unused after the Coater trials, thereby saving unnecessary waste generation. While the reduction in this category is difficult to measure, due to widely variable waste generation resulting from widely variable solvent-based coating use in the Pilot Coater, it is easy to see that the reduction is real.
- 4) Attachment 3 Addendum: MEGTEC Systems will commit to the following goals to maintain our superior environmental performance.
  - 1) Remain a Small Quantity Generator.
  - 2) Work towards Conditionally Exempt Small Quantity Generator status by substituting a less environmentally polluting cleaning solution for paint operations.
  - 3) Work with our contractors and suppliers to develop environmentally preferable solutions to current products or practices.
  - 4) Complete and implement our Portable Generator Operational Control Procedure by the end of 2005.
  - 5) Communicate to our top 300 suppliers to encourage their development of Environmental Management Systems and to promote our participation in Wisconsin Green Tier by the end of 2006.
  - 6) Capture results of the Energy Conservation Green Belt project and implement appropriate and feasible transformations.
  - 7) Share environmental improvement results achieved through 6 Sigma and other Operational Excellence projects.
  - 8) Share opportunities or improved environmental performance that are identified as a part of our Environmental Management System processes.

Attachment 4: Please see attached copy of Third Party Certification, Environmental Policy Statement (including Scope), and Objectives and Targets

Attachment 5: Please see our description of stakeholders and their addresses below.

- 1) Our neighbors in the industrial park. These would include adjoining businesses on Enterprise Drive (West and South of our facility), Prosper Road (North and East of our facility), and County Highway PP (East of our facility). These businesses include: Protective Flooring & Linings, C A Lawton, Bay Engineered Castings, B&J Machine, Remis Battery Systems, Power & Control Products Company, Drew's Roofing, Valley Cabinet, and Don Van Straten Trucking. Their stake in our system includes airborne emissions, and waste that may be discharged onsite or in transport and migrates to their premises.

Protective Flooring & Linings  
2009 Enterprise Drive  
DePere, WI 54115

C A Lawton  
1950 Enterprise Drive  
DePere, WI 54115

Bay Engineered Castings  
1900 Enterprise Drive  
DePere, WI 54115

B&J Machine  
801 Prosper Road  
DePere, WI 54115

Remis Battery Systems  
809 Prosper Road  
DePere, WI 54115

Power & Control Products Company  
825 Prosper Road  
DePere, WI 54115

Drew's Roofing  
815 Prosper Road  
DePere, WI 54115

Valley Cabinet  
845 Prosper Road  
DePere, WI 54115

Don Van Straten Trucking  
850 Prosper Road  
DePere, WI 54115

- 2) The DePere Wastewater Treatment Facility, primary contact Mr. Robert Kennedy. One part of our process includes cleaning of metal components and assemblies, another part includes plasma cutting of metal with a water bed to prevent overcutting into the floor, and the water residue from these is treated then discharged to the Wastewater Treatment Facility. That Facility has an interest in our properly operating our treatment system as improper treatment can result in toxic concentrations of metals deposited to the Treatment Works.

City of DePere  
Wastewater Treatment Facility  
315 Leonard Street  
DePere, WI 54115

Primary contact: Mr. Robert Kennedy

- 3) Our waste haulers and recycling vendors. Currently, we dispose of used paper and cardboard, scrap wood (pallets and crates), and refuse through Waste Management Northeast, primary contact last I knew was Darrell Ruh. We recycle steel and other metals through B&B Metals, primary contact Mr. Robert Burrows. Both have an interest in our preparing our waste streams for shipment in accordance with regulations and in not contaminating the waste streams with incompatible materials. We are in the process of changing our hazardous waste vendor, and have not yet offered them a shipment, so I would not include them as a stakeholder at this time.

Waste Management Northeast  
1861 E. Allouez Avenue  
Green Bay, WI 54307  
Primary contact (last I knew): Mr. Darrell Ruh

B&B Metals  
14520 Pioneer Road  
Newton, WI 53063  
Primary contact: Mr. Robert Burrows