



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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October 30, 2008

Tom Hanson - Plant Manager
Phillips Plastics Corporation Multi-Shot
1233 International Drive
Eau Claire, WI 54701

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Mr. Hanson:

Congratulations! Following a 30 day public comment period, the Wisconsin Department of Natural Resources (DNR) has approved your application as a participant in Green Tier. This letter of acceptance covers the Phillips Plastic Corporation Multi-Shot operation at 1233 International Drive, Eau Claire, Wisconsin and the activities outlined by your application. This letter is issued in accordance with the Environmental Results Program Act as authorized by Wisconsin Statute section 299.83, effective May 1, 2004, when 2003 Wisconsin Act 276, commonly referred to as the "Green Tier Law", was signed into law.

This letter of acceptance recognizes your previous achievements in environmental management and your future projects and goals as described in your application. Your participation in the Green Tier program reflects your commitment to protect the environment through superior environmental performance. This letter serves as an acceptance of the commitments your facility agreed to in your application. Should circumstances arise that may prevent the fulfillment of these commitments, please notify us.

By entering the Green Tier Program, you have agreed to develop and pursue goals to improve your environmental performance beyond compliance while utilizing an Environmental Management System (EMS). The Department recognizes that you have fulfilled the requirement of implementing an EMS and congratulate you on your recertification to ISO 14001 on March 11, 2008. You have also committed to perform an annual audit of your EMS, with every third audit performed by an outside environmental auditor approved by the department.

As a part of your commitments, you have agreed to submit to the DNR an annual report regarding your participation in the program. These reports should provide an update of your current objectives and targets, as well as discuss any measured progress made toward those objectives and targets stated in your EMS or on your application. In addition, you should present the results of your annual EMS audit, describing any non-conformances discovered by it and identify actions taken or proposed to correct them. Your first report should be submitted no later than March 18, 2009 or another date that may be arranged with the Department.

We also ask that you consider addressing the attached list of generic environmental indicators in your annual report, especially those related to the objectives and targets established in your application for the Phillips Multi-Shot facility. This additional reporting is completely voluntary, but it can help to quantify your successes beyond those explicitly outlined in your application or

EMS. This information will also help document the overall successes of the Green Tier program.

Our experiences have shown that organizations realize significant benefits from working regularly with an external group of interested stakeholders. As your participation in Green Tier matures, we would encourage you to consider collaborating with the department to develop such a group. We also ask that you describe this or any other communications with concerned entities in your annual report.

In recognition of Phillips Plastics' diligent environmental stewardship as a Green Tier participant, you are entitled to Deferred Civil Enforcement as described in Wisconsin Statute section 299.83(6m)(d). In brief, if you discover either a non-conformance with your EMS or a violation of an existing environmental requirement, provide us notice of your discovery along with a corrective action plan that conforms to the requirements in the statute. DNR will not seek to impose penalties on Phillips Plastics Multi-Shot facility for the non-conformance or violation provided the facility successfully implements the corrective action plan in a timely manner. Please note that nothing in this acceptance letter replaces any obligation that you have to report and correct any violations of law or regulation.

In addition, this letter authorizes your use of the Green Tier logo on written materials related to your facility. Please see the enclosed guidelines for further information regarding the use of the logo. Furthermore, you will receive a certificate that recognizes Phillips Plastics Multi-Shot's participation in Green Tier. The department has committed to annually celebrating your participation in the program through a press release, and will publicize Phillips Plastics Multi-Shot as a Green Tier participant on the DNR website.

Finally, Mark Harings has been assigned as your single point of contact. He can be reached at 715-831-3263 or at Mark.Harings@wisconsin.gov. Please contact Mark with any questions concerning communications with the department, approvals you may be required to obtain, or for any technical assistance you need.

I want to welcome you as a Tier 1 participant in Green Tier and know that we stand ready to work with you on a Tier 2 contract in the future.

Sincerely,

/Matthew J. Frank/

Matthew J. Frank, Secretary
Wisconsin Department of Natural Resources

Attachment: [Tier 1 Application](#)
Generic Suite of Environmental Indicators (attached)
Green Tier Logo Files and Guidance CD

The following Indicators are proposed for all Green Tier participants. In addition to this Generic List, it is expected that other indicators/metrics will come out of your Environmental Management System and would be used to document accomplishments. This Generic List is meant to help Phillips Plastics Corporation Multi-Shot and the DNR document the relative success of the program.

Environmental Indicators

Some of the environmental indicators are already provided to the DNR. You would not be asked to report this information again if you have already reported it.

1.1 Water

- 1.1.1 Total water use
- 1.1.2 Total amount of phosphorous released into water
- 1.1.3 Total waste water produced

1.2 Air Emissions

- 1.2.1 Total greenhouse gas emissions
- 1.2.2 Total emissions of ozone-depleting substances
- 1.2.3 Total air emissions

1.3 Waste

- 1.3.1 Total solid waste produced
- 1.3.2 Total percentage of material ending up as waste
- 1.3.3 Amount/percentage of waste that is hazardous
- 1.3.4 Amount of mercury lost or released into the environment
- 1.3.5 Amount/percentage of waste recycled

1.4 Energy

- 1.4.1 Total energy used, listed by source
- 1.4.2 Amount/percentage of energy from renewable resources

1.5 Transportation

- 1.5.1 Total fuel consumption
- 1.5.2 Amount/percentage of vehicles using alternative fuels

1.6 Spills

- 1.6.1 Number of spills
- 1.6.2 Total amount of hazardous substances released due to spills

1.7 Land Use

- 1.7.1 Total amount of land owned and percentage that is permeable (not paved or covered)

1.8 TRI

- 1.8.1 Total TRI emissions

Economic Metrics

- 2.1 Total sales – revenue brought in from annual sales before subtracting any costs.
 - 2.2 Profit or loss – Quantify the profit or loss during the most recent fiscal year
 - 2.3 Workforce changes – number of people employed, and the change over the previous year (using Jan 31 as the baseline date)
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Social Metrics

- 3.1 Amount provided to support alternative transportation options for employees
- 3.2 Income inequality – the multiple between lowest paid employee and highest paid employee
- 3.3 Percent of purchases made from companies in the state