

Attachment 3



Mr. Mark McDermid
Bureau of Cooperative Environmental Assistance
Wisconsin Department of Natural Resources
PO Box 7921, CO/7
Madison, WI 53707

Reference: 2007 Green Tier Functional Equivalency Submission

Dear Mr. McDermid,

I have reviewed the Serigraph Inc. functional equivalency submission. I find that Serigraph's Green Tier Program conforms to each of the 12 requirements in Wis. Statutes §299.83(1)(dg) as a functionally equivalent management system. Serigraph will schedule an annual audit by an approved third party environmental auditor and will submit an annual report on the environmental management system audit that is in compliance with (6m) (a).

Signed: _____ Date: _____

Linda H. Buntrock
Sr. VP Human Resources & EHS



Program Scope

Serigraph has developed and is maintaining an EMS in order to ensure that the company continues to supply a high-quality product to our customers while providing a safe, healthy workplace for our employees, and acting as a responsible member of our community. Serigraph's EMS is designed to help the company identify and understand its environmental impacts and, through proactive management, reduce the risks that operations pose to its co-workers and to the environment. The EMS is also the means through which we follow through on the commitments expressed in our environmental policy.

Serigraph's EMS presently covers its operations on all sites owned or operated in the West Bend, Wisconsin area. The management of the EMS commences at the point of entry of raw materials and ceases at the point of exit of manufactured product. This policy also covers the management of all byproducts produced as the result of manufacturing operations, which go offsite, including but not limited to, wastes and recyclables. This policy shall also cover all real estate owned and/or under the direct control of Serigraph in the West Bend area. The EMS policy excludes activities that are beyond the control of Serigraph including customer requirements, designs, and materials mandated by Serigraph customers. This policy shall also exclude, at this time, materials shipped by Serigraph to other company-controlled sites or partnerships outside of the West Bend area. The scope of Serigraph's EMS may be modified at any time as corporate management deems necessary. Modifications shall be incorporated into this document.

Environmental Policy

Serigraph Inc. believes that environmental stewardship is a corporate responsibility. Serigraph shall manage its operations in a manner that reflects continual environmental improvement of the air, land, and water. To achieve this, Serigraph shall establish a framework for setting and reviewing environmental objectives and targets.

Serigraph shall endeavor to:

Maximize the efficient use of raw materials

Manage its waste products in a responsible manner

Maintain and improve the environment in a feasible manner

Serigraph shall maintain compliance with respect to all local, state, and national environmental requirements.

Serigraph shall involve the community as necessary in an advisory manner.

This policy and its intent shall be communicated to all Serigraph co-workers.

Goals FY 2008:

1. Recycle 100% of all materials identified as recyclable
2. Reduce wipe usage ratio of 65/screen to 40/screen
3. Complete mixture Design of Experiment to determine if cleaning solvent blend can be re-formulated with less VOC component percentage from current formula.
4. Reduce VOC's as a percent of sales to .000020%.



2006 Green Tier Functional Equivalency Documentation February 7, 2007

Introduction

Green Tier is a collaborative system of contracts and charters crafted jointly by participating businesses and the Department of Natural Resources designed to streamline environmental requirements and encourage new environmental ideas. On May 27, 2005, Serigraph, Inc. submitted an application for its Plant 4 facility located at 2230 Stonebridge Circle, West Bend, Wisconsin, to join the Green Tier I program. On November 28 of the same year, the Company notified the DNR that it wished to amend its application to include its Plant 2 facility located at 3801 E. Decorah Road, West Bend, Wisconsin. One of the criteria of Tier I is to install an environmental management system (EMS) that meets the requirements of ISO 14001:2004 or has been determined by the Department to be functionally equivalent.

Tier I allows for the use of one of two options for demonstrating that an EMS has been established. Option A allows the applicant to submit documentation substantiating the installation of an EMS, and Option B consists of a third party audit. Serigraph, Inc. chooses at this time to utilize Option A. Wisconsin Statute §299.83(1)(dg) outlines the specific criteria that a Green Tier applicant must address in order to be considered to have a function EMS.

The following material in this document is for the purpose of supporting Option A:

1. Adoption of an Environmental Policy

During 2006, Serigraph amended its Environmental Policy, placing greater emphasis on sustainability. A copy of the policy can be found in the appendix.

2. Analysis of Environmental Aspects and Impacts

During 2006, Serigraph developed a system to identify environmental aspects and evaluate their impacts. The process involved a steering committee which included co-workers from Environmental Health & Safety (EH&S), production supervisors and hourly co-workers. A numerical ranking system was used for evaluating both aspects and impacts. The evaluation criterion for aspect impact includes:

- Frequency of the activity
- Volume of the activity
- Severity of the environmental implications
- Co-worker health and safety hazard

Each of the elements was assigned a numerical number based on intensity. The numbers were summed for each aspect which then allowed for a ranking system of all the aspects.

Serigraph decided to limit its identification of aspects to certain areas where the high's impacts were most likely to occur. These areas included ink and screen rooms, printing, post printing, and recycling. Areas that were deferred for evaluation to a later date were receiving, maintenance, buildings & grounds, vendors, and customers. Samples of aspect and impact evaluations are located in the appendix.

3. Plans and Procedures for Compliance

Serigraph has several written programs for the management of air emissions, waste, and water related issues. The company maintains a daily record keeping system for VOC activities. Records are reviewed on a weekly basis for accuracy and a monthly emission summary is developed. Semi-annually Serigraph reviews its VOC program and submits an air emission compliance demonstration report to the DNR and EPA. EH&S reviews all capital purchasing requests with respect to permitting requirements and if a permit is necessary, proceeds accordingly. The company maintains a protocol for accumulating storing and shipping of its hazardous and non-hazardous wastes. Waste water is sampled semi-annually with test results being provided to the local POTW. Serigraph maintains a non-contact status for storm water and has a written program for its management along with an SPCC program. During the establishment of the EMS, compliance plans and procedures were reviewed by EH&S to assure that they conformed to EMS expectations.

4. Identification of All Pertinent Environmental Requirements

Serigraph has reviewed codes and regulations to identify those that may be relevant to the company. The Company believes that it has, to the best of its ability, identified those requirements that are pertinent. A list of those applicable requirements is contained in Serigraph's EMS Manual.

5. A Process for Setting Objectives and Action Plans

Serigraph's EMS manual contains a method for the evaluation of environmental impacts by the EMS steering committee so that objectives and actions plans can be established. The plan ranks the environmental aspects according to their environmental impact numerical rating. The steering committee then identifies alternative approaches. The approaches are then evaluated for environmental impact, economic feasibility, and implementation ability. For Serigraph, one of the primary driving factors is the ability to implement a project in order to achieve continual environmental improvement. During 2006, Serigraph implemented three projects, wastewater recovery and reuse, plastic pail recycling, and stainless steel screen mesh recycling. A summary of each project is located in the appendix.

6. Operational Control Structure

As part of EMS development, EH&S reorganized its written plans, work instructions, and forms. The new structure divides the EMS program into the following categories:

- Corporate Wide – Programs that affect the company corporate wide
- Pre-printing – Programs that affect those activities prior to or support the printing process
- Printing – Programs directly associated with the printing process
- Post Printing – Programs that affect post printing operations and other ancillary support groups.

Within each of the categories are the sections:

- Written Plans
- Work Instructions
- Forms

7. Employee Training Plan

Serigraph's training plan is divided into the following categories:

- Orientation for new co-workers
- General awareness which is presented periodically all co-workers at Quarterly Meetings
- Specific training provided as a part of the co-worker's job function
- Retraining which is provided in the event of changes in procedures or in the event that an infraction is uncovered.

The training section of Human Resources is responsible for the training program.

8. Emergency Response and Corrective Action

Serigraph's emergency action plan is divided into several parts:

- Tornado

Fire/Explosion
Utility Failure
Chemical Spill

Serigraph utilizes the uniform command system for responding to emergency situations. The Company maintains a Level B hazardous materials response team which is on call 24 hours per day. In addition, various co-workers receive first Responder / Spill training. Serigraph has written plans for Spill Prevention Control and Countermeasures, releases of hazardous materials, and malfunction abatement prevention for its bio filter. Corrective action measures are incorporated into various management plans and the training program.

9. Communication Plan

Serigraph communicates with its co-workers through general co-worker meetings, periodic bulletins, and when necessary departmental meetings. The company has developed a procedure for addressing inquiries initiated by the public. Serigraph regularly communicates with the DNR on various matters. The company's EMS plan provides for an annual report to be developed and made available.

10. Procedures for Document Control

During the development of the operation control structure, EH&S created an alpha-numeric system for its documents. The following illustrates the control method.

	Plan / Procedure	Work Instruction	Form
Corporate Wide	CWP xxx	CWI xxx	CWF xxx
Preprinting	PPP xxx	PPI xxx	PPF xxx
Printing	PTP xxx	PTI xxx	PTF xxx
Post Printing	PSP xxx	PSI xxx	PSF xxx

11. Environmental Management Systems Audit

Serigraph's EMS manual contains a process for conducting internal audits. In general, the format conforms to ISO 9001 structure. The process contains elements for corrective action and follow up. Internal audits shall be conducted at a minimum of annually. Audits will be performed by Serigraph's internal ISO auditors.

12. Continual Improvement of Environmental Performance

Serigraph's EMS program provides for an annual review of environmental activities. This includes the following elements:

- Review of previously identified environmental aspects and impacts
- Identification and evaluation of any environmental aspects
- Establishment of annual targets and goal
- Plan development and implementation
- Evaluation of annual activities

The process involves hourly and salaried co-workers and is coordinated by EH&S.

Management Review

EH&S shall create an annual report which will be reviewed by senior management. In addition, quarterly updates describing current activities shall be prepared and reviewed with management by EH&S staff.

ISO 14001 / Green Tier Audit Schedule

o = audit scheduled

+ = results completed satisfactorily

x = audits with corrective action

1,2,3 = shifts audited

	Feb	Mar	Apr	May Start ISO 14001 / Green Tier2	Jun	Jul	Aug	Sep	Nov	Dec
Processes & Activities										
Management Review				o/1,B+			o/1,A+			
EMS Responsibilities				o/1,B+			o/1,B+			
1.Environmental Policy				o/1,B+						
2. Identification of Environment Aspects			o/1,B+							
3. Review of compliance demonstration records			o/1,B+							
4. Identification of Environment Requirements			o/1,B+							
5. Environmental Objs in Management Review				o/1,A+						
6. Operational control of Env performance in MR		o/1,B+								
7. Hazmat / FRO / Env Training			o/1,B+							
8. Environmental Emergency response process			o/1,B+				o/1,B+			
9. Communication plan with Employees and public				o/1,A+			o/1,A+			
10. Environmental Doc control procedure			o/1,B+							
11. EMS audits completed as scheduled				o/1,A+						
12. Management Review Process for CI of Env Objs			o/1,B+				o/1,A+			
SPCC-Spill Prev Control Countermeasures			o/1,B+				o/1,A+			