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Green Tier Commitment Outline for ABB Inc.

Approval Date – December 11, 2008

Commitment Outline Updated: (02/07/2020)

The updates since participation started are:

- Updated general content, format and links
- New Project Coordinator
- New Single Point of Contact
- Updated Annual Reporting Date

I. Environmental Management Systems (EMS) & Audit Requirements

Your EMS must either be ISO-certified, or you must demonstrate that it is functionally equivalent. For information on how to demonstrate the functional equivalency of your EMS, please see: <https://dnr.wi.gov/files/PDF/pubs/co/C0503.pdf>

You have supplied us with a copy of your ISO 14001 certification, satisfying initial Green Tier EMS requirements.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **December 11, 2009** and every year after that, you must perform an environmental management system audit. The department recommends that your first audit be completed by a DNR-approved outside environmental auditor.
- B. On or before, **December 11, 2011** and every third year, this audit **must** be completed by a DNR-approved outside EMS auditor. The list of approved auditors can be found at: <https://dnr.wi.gov/topic/GreenTier/Auditors.html>

II. Provide an Annual Report

- A. **Annual Report Due Date** - We have mutually agreed that the deadline for your Green Tier annual report is **March 15**. (Please feel free to discuss alternative reporting dates with your Project Coordinator should your needs change.)
- B. **Reporting on Environmental Performance Commitments:** Your first report should follow the annual report instructions provided below and should provide data on your progress toward meeting your environmental performance commitments laid out in your Green Tier application or your previous year's Green Tier annual report. In your application you identified the following environmental commitments:
 - Reducing facility energy use
 - Improving energy efficiency of products
 - Reducing chemical waste stream and time stored at facility
- C. **Annually**, you will need to report progress on the commitments that you have made. For more details about annual reports and metrics, see the annual report instructions provided on the website; <https://dnr.wi.gov/topic/GreenTier/ReportInstructions.html>
- D. Please provide annual Green Tier Reports to: GreenTier@Wisconsin.gov and your Single Point of Contact.

III. Work toward Superior Environmental Performance

Implement environmental improvements that aim to achieve Superior Environmental Performance as defined in Green Tier law. This means environmental performance that results in measurable or discernible improvement in the quality of the air, water, land, or natural resources, or in the protection of the environment, beyond that which is achieved under environmental requirements. More information on Superior Environmental Performance can be found here:

<https://dnr.wi.gov/topic/GreenTier/SuperiorEnvironmentalPerformance.html>

IV. Green Tier - Tier 1 – DNR Commitments

- A. **Single Point of Contact (SPOC):** Your single point of contact or SPOC is your liaison to the department, answering your questions or making connections within DNR or with other experts. Your SPOC is: Randy Malek - DNR, Phone: 262 - 521 - 5012, Randall.Malek@Wisconsin.gov.
- B. **Green Tier Logo:** Green Tier participants may use the Green Tier logo on stationery, promotional and educational materials related to your facility. Logo files as well as the Green Tier Style Guide with additional guidelines and information are available online at: <https://wi-dnr.widencollective.com/portals/nkc57xuv/GreenTierBranding>. Your Project Coordinator can provide you with the current access code.
- C. **Recognition:** Along with the certificate of recognition, the department will host a [participant web page](#) for easy reference. Participants should provide information and pictures on their environmental efforts to populate the webpage. We will also promote your successes throughout your tenure in Green Tier using a variety of DNR communication channels.
- D. **Project Coordinators:** You should also feel free to contact your Project Coordinator for Green Tier specific information. Project Coordinators provide support to SPOCs and participants providing reminders on Green Tier requirement dates and by promoting a participant's successes. Your project coordinator is: Weston Wegener, Phone: 608-264-9753, Cell: 608-284-0908, Weston.Wegener@Wisconsin.gov.
- E. **Minimum Inspection Frequency:** Because you have implemented an EMS, you are entitled to inspections at the lowest frequency permitted by the programs under law. The department will work with you to determine how this will work for you.
- F. **Deferred Civil Action:** You are entitled to Deferred Civil Enforcement as described in statutes (299.83(6m)(d)). If you discover a violation of an existing environmental requirement, you are entitled to protection from any civil penalties that the department might otherwise impose if you:
 - 1. Notify the department
 - 2. Provide a corrective action plan and documentation of your Environmental Management System (EMS) adjustments that ensure the violation will not happen again, and
 - 3. Correct the violations within 90 days



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Matthew J. Frank, Secretary

101 S. Webster St.
Box 7921
Madison, Wisconsin 53707-7921
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FAX 608-267-3579
TTY Access via relay - 711

December 11, 2008

Rick Kegel
ABB Inc.
16250 W Glendale Dr
New Berlin, WI 53151

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Mr. Kegel:

Congratulations! The Wisconsin Department of Natural Resources (DNR) is pleased to approve your application and welcome you into the Green Tier Program. This letter of acceptance recognizes the value of ABB's Environmental Management System and your accomplishments to date. You have proposed future projects and goals in your application (see attached) which continue to demonstrate your commitment to superior environmental performance.

By entering the Green Tier Program with a certified Environmental Management System (EMS), you have demonstrated the power of systematically identifying opportunities for environmental improvement (either in product production or product use). Your stated goal of reducing energy use at the facility by 5% is admirable, and will result in not only cost savings to you, but a reduced carbon footprint for your facility. We also applaud your systematic approach to improve the energy efficiency of your products through the use of sector specialists. Finally, your goal of reducing your chemical waste stream and reducing the time that chemical waste is stored at the facility is commendable. Should circumstances arise that prevent the fulfillment of these commitments, please notify us

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 current objectives and targets in your EMS. You should also present the results of your annual EMS audit, describing any non-conformances discovered and identifying actions taken or proposed to correct them. Your first report should be submitted no later than March 15, 2010, although we will encourage you (but do not require you) to submit a preliminary or draft annual report for calendar year 2008 by the end of April 2009.

We also ask that you address the attached list of generic environmental indicators in your annual report, especially those related to ABB's identified objectives and targets. 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 use stakeholders in the development of objectives and targets. We also ask that you describe this and other communications with concerned entities in your annual report.

In recognition of ABB's Environmental Management System and your diligent environmental stewardship as a Green Tier participant, DNR commits to inspect ABB at the lowest frequency permitted by law, unless DNR has reason to believe the facility is out of compliance. In addition, 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 ABB for the non-conformance or violation provided ABB 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.

This letter authorizes your company to use the Green Tier logo on written materials related to your facility. Please see the attached guidelines for further information regarding the use of the logo. Furthermore, you will receive a certificate that recognizes ABB's participation in Green Tier. The department has committed to annually celebrate your participation in the program through a press release, and will publicize ABB as a Green Tier participant on the DNR website.

Finally, John Schwabe has been assigned as your single point of contact. He can be reached at 262-574-2147 or at john.schwabe@wisconsin.gov. Please contact John with any questions concerning communications with the department, approvals you may be required to obtain, or for any technical assistance you need.

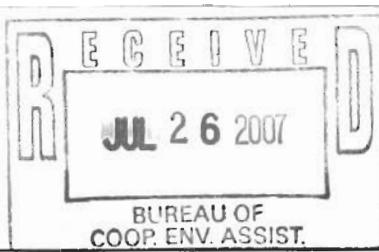
I want to welcome you as a Tier 1 participant in Green Tier and encourage you to work toward Tier 2 status in the future.

Sincerely,

/s/ Matthew Frank

Matthew J. Frank, Secretary
Wisconsin Department of Natural Resources

Attachment: Tier 1 Application
Generic Suite of Green Tier Indicators



Notice: Collection of this information is authorized under s. 299.83 Wis. Stat. Participation in Green Tier and completion of this form are voluntary. Personal information collected on this form, including such data as your name, address, phone number, etc., will be used in the implementation of Green Tier and will be made broadly available under the Green Tier program. Information will also be made accessible to requesters under Wisconsin's Public Records Law (ss. 19.32 - 19.39, Wis. Stats.). If you need to request confidential treatment of any information in order to protect a trade secret, please contact a DNR representative *prior* to submitting this form. Applications must be considered complete by the DNR in order to be processed. For complete application instructions, see "Green Tier Application Instructions," publication number CO-501.

This application is for... (check one): Tier 1 Tier 2 (attach Letter of Intent to this form)

I. Applicant Information

Contact Name	JERRY ULADZINSKI			Title	MANAGER, FACILITIES			
Street Address	16250 W. GLENDALE DRIVE		City	NEW BERLIN	State	WI	ZIP Code	53151
Telephone Number	262-785-3415		Fax Number	262-785-3310		E-mail Address		JERRY.ULADZINSKI@US.ABB.COM

II. Facility Information

Facility Name	ABB INC.			County	WAUKESHA			
Street Address	SAME		City	SAME	State		ZIP Code	
Mailing Address	SAME		City	SAME	State		ZIP Code	

Please provide all DNR Facility Identification numbers (FID #) that apply to the covered facility or activity.

III. Scope of Green Tier Participation (check one)

- This application covers all activities at the facility listed in Section II.
- This application covers all activities at more than one facility. For each facility to be covered under this application provide the information from Section II on a separate page labeled **Attachment 1**.
- This application **does not** cover all activities at every covered facility. Please describe the exact scope of activities and facilities to be covered in the program on a separate page labeled **Attachment 1**.

IV. Environmental Performance

Please provide the following information on a separate page labeled **Attachment 2**. Refer to the *Application Instructions* for definitions of environmental performance and superior environmental performance.

- Tier 1 Applicants:**
- Describe your past and current environmental performance with respect to each covered facility or activity included in this application. Within this attachment establish a baseline date against which future progress can be measured.
 - Describe your future plans for enhancing the environment with respect to the same facilities/activities.
- Tier 2 Applicants:**
- Provide information demonstrating your record of superior environmental performance. Within this attachment establish a baseline date against which future progress can be measured.
 - Describe the measures you propose to take to maintain and improve your superior environmental performance.

V. Environmental Management System (EMS)

- a. Have you implemented an EMS that is certified to the ISO 14001 standard? Yes No (circle one)
- b. Have you implemented an EMS that is functionally equivalent to ISO 14001? Yes No (circle one)

If you circled "No" for both questions, you are not eligible for Tier 2. Please proceed to Section VI only if you are applying for Tier 1.

- If you circled "Yes" for either question, please provide a copy of the following documents labeled as **Attachment 3**:
- Proof of ISO 14001 certification OR functional equivalence (refer to *Application Instructions* for details)
 - Environmental policy statement and scope statement
 - Documented objectives and targets for the covered facilities/activities

VI. Public Notice/Stakeholder Identification

Please provide in a separate document labeled **Attachment 4** a list of stakeholders whom you know or expect will have a strong interest in your Green Tier application, as well as contact information for those stakeholders. This information will help DNR expedite the processing of your application. Tier 2 applicants must provide additional information about stakeholder involvement in a Letter of Intent. Refer to *Application Instructions* for details.

VII. Enforcement Record

Please review the Enforcement Record requirements described in the *Application Instructions* very carefully, and then check the appropriate box:

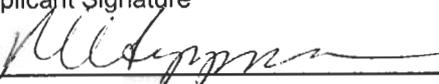
- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

If a waiver is requested, please provide information describing any requirements not met and a justification for the waiver request on a separate page labeled **Attachment 5**. Note that waivers will be granted only in exceptional circumstances.

VIII. Tier 1 Applicant Statement of Commitments

I commit with my signature to the following statements and certify that all information provided in this application is true and correct under penalty of law:

- Implement, within one year of the date of this application, an EMS for each covered facility or activity that is certified to the ISO 14001 standard or is functionally equivalent to ISO 14001 as determined by DNR.
- Conduct annual EMS audits, with every 3rd EMS audit performed by a DNR-approved outside environmental auditor.
- Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- Submit to DNR an annual report on progress towards meeting objectives related to improved environmental performance for aspects regulated under chs. 29 to 31, 160, or 280 to 299, Wis. Stats., unregulated environmental aspects, or voluntary actions to restore, enhance, or preserve natural resources.

Applicant Signature 	Date Signed 26 JUN 2007
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IX. Tier 2 Applicant Statement of Commitments

I commit with my signature to the following statements and certify that all information provided in this application is true and correct under penalty of law:

- Conduct annual EMS audits performed by a DNR-approved outside environmental auditor.
- Conduct or have another person conduct an annual audit of compliance with environmental requirements that are applicable to the facilities and activities covered under Green Tier.
- Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- Submit to DNR an annual report on each compliance audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.

Applicant Signature	Date Signed
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X. For Department Use Only					
Date Received	Initials of Reviewer	Status	Date Returned to Applicant for Additional Information	Date Denied	Date Approved

ABB, New Berlin Facility Green Tier Application Attachment 1

Facility Information

Company Name: ABB, Incorporated – New Berlin Facility

Street Address: 16250 West Glendale Drive

City: New Berlin

State: Wisconsin

Zip Code: 53151

ABB, New Berlin Facility Green Tier Application Attachment 2

RE: Regarding Superior Environmental Performance Objectives for ABB plant located at 16250 West Glendale Drive, New Berlin, Wisconsin 53151

Past Environmental Performance

The ABB New Berlin facility operations include the product development, design, manufacture, sales, and service of AC and DC drives, control systems and power converters, and sales of electric motors. For an energy-driven ABB product, most environmental impacts arise during its operating life rather than during its manufacture. To ensure that ABB can minimize its product's consumption footprint, the facility has implemented design modifications to its existing product line that focuses on energy efficiency throughout the lifetime of the products.

In order to further this product and process improvement strategy, the ABB New Berlin facility (ABB) has initiated a sector specialist team system. The sector specialist team system utilizes the strengths and ingenuity of employees at the facility who are involved in the daily operations. Each team is tasked with improving a sector of the operations. This system has resulted in substantial increases in an ABB product's efficiency throughout its use and at every stage of the manufacturing, receiving, and distribution process.

Additionally, the sector specialist approach has assisted ABB in the development of a process driven Environmental Management System (EMS) certified under ISO 14001:2004. ABB's EMS identifies and divides each process undertaken at the facility and lays out a clear, concise procedure that has been designed with input from sector specialist teams to reduce environmental impacts. ABB has established process procedures designed to further reduce environmental impacts.

To enhance the functionality of the system, ABB routinely audits the effectiveness of its procedures and ABB sets achievement goals through its Environmental Objectives and Targets program (O's and T's). As the target dates approach, ABB reviews its progress in implementing the system. ABB has previously used its O's and T's program to implement a facility-wide asbestos removal program, a product line energy usage reduction program, a hazardous substance reduction and removal program, a recycling and reuse program, a suppliers checklist to ensure downstream environmental management review program, and a facility storm-water run-off review.

Current Environmental Performance Efforts

ABB is currently completing a facility-wide lighting upgrade to promote energy efficiency. ABB has developed an O's and T's framework for retrofitting all office lighting with T8 electronic ballasts (350 fixtures) and converting metal halide lighting in the shop area with energy efficient T5 fluorescent lighting (2,022 tubes). To further this objective, ABB has committed to the installation of motion detectors in conference rooms, offices and training rooms. ABB is currently in the process of replacing the ballasts and testing the fluorescent lighting and motion detector systems to determine the

best equipment for the facility. Preliminary tests and calculations suggest the reduction of waste electricity should result in a complete recovery of expenses. ABB intends to complete the facility-wide energy usage reduction program by the end of the year.

In addition to the lighting upgrades, ABB has set an objective of reducing total energy usage by 5% over the course of the year. This target has been designated in an effort to further reduce ABB's carbon footprint and is being implemented to reduce ABB's greenhouse gas emissions. To further accomplish ABB's goal of reducing greenhouse gas emissions, the facility is currently in the process of building new receiving docks to improve product flow and output. These steps to promote efficiency will minimize transportation fuel usage and energy utilized in the manufacturing, storage, and shipping of products produced at the facility.

ABB has also set the objective of improving employee awareness of ABB's recycling program by posting visual indicators and reference materials pertaining to the Environmental Aspect Handling and Disposal Procedure and reporting the latest environmental news to ABB employees. ABB has identified seventeen (17) target areas where increased awareness materials should have the greatest influence. The seventeen areas include: twelve conference rooms, two training rooms, two break areas, and a cafeteria. ABB has a target completion date near the end of summer 2007.

Lastly, ABB continues to identify and set new environmental objectives through our continual environmental improvements program. This program allows ABB employees the flexibility to identify processes and implement environmental improvement strategies for areas that do not require the structure of our O's and T's program. Currently, this program is being implemented to reduced ABB's chemical waste stream, reduced onsite petroleum and chemical waste storage time, and to reduce the energy utilization on ABB's production line. The continual environmental improvements program also provides an incentive to employees to air proactive ideas to improve efficiency and environmental performance that often leads to ABB's future O's and T's.

ABB commits to reporting any future O's and T's that the facility adopts to the WDNR and to report the progression of those programs that are currently being implemented.



DET NORSKE VERITAS MANAGEMENT SYSTEM CERTIFICATE

Certificate No. CERT-03330-2004-AE-HOU-ANAB

This is to certify that

ABB INC.

at

16250 West Glendale Drive, New Berlin, WI 53151 USA

Has been found to conform to Management System Standard:

ISO 14001:2004

This Certificate is valid for the following scope:

THE ENVIRONMENTAL MANAGEMENT SYSTEM OF ABB INC. LOCATED IN NEW BERLIN, WI ASSOCIATED WITH PRODUCT DEVELOPMENT, DESIGN, MANUFACTURE, SALES, AND SERVICE OF AC AND DC DRIVES, CONTROL SYSTEMS AND POWER CONVERTERS AND SALES OF ELECTRIC MOTORS

Place and date:

Houston, Texas; 12 April, 2007

This certificate is valid until:

10 April 2010

for the Accredited Unit:
DET NORSKE VERITAS CERTIFICATION, INC.
Houston, TX USA

Initial Certification Date:
13 March 2001




Rudy Frueboes
Management Representative
Det Norske Veritas Certification, Inc.

The audit has been performed under the supervision of:

Linda Markham-Nitz
Lead Auditor