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Green Tier Commitment Outline for 3M – Cumberland WI

Approval Date – February 18, 2010

Commitment Outline Updated: 2/5/2020

The updates since participation started are:

- Change of project coordinator
- Change of SPOC
- Updated general content, format and links

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, **February 18, 2011** (this should be *one* year after the date on the letter) 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, **February 18, 2013** (This should be *three* years from date on letter) 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, 2010** and annually thereafter. (Please feel free to discuss alternative reporting dates with your Project Coordinator, JenniferA.Birkholz@Wisconsin.gov 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.
- 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 both of these email addresses: GreenTier@Wisconsin.gov and to your Single Point of Contact, Sonny.Zentner@Wisconsin.gov.

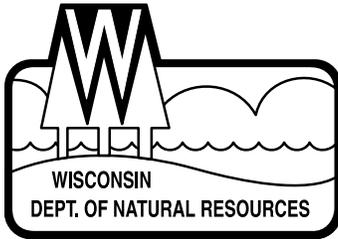
III. Work toward Superior Environmental Performance

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: Sonny Zentner - DNR, Phone 715-839-3798, Cell 715-579-5361, Sonny.Zentner@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: Jenni Birkholz, Phone 608-266-8226, Cell 608-514-2182, JenniferA.Birkholz@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
Telephone 608-266-2621
FAX 608-267-3579
TTY Access via relay - 711

February 18, 2010

Thomas G. Harris
Plant Manager, 3M Cumberland
1640 Western Ave.
Cumberland, WI 54829

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Mr. Harris:

Congratulations! The Wisconsin Department of Natural Resources (DNR) is pleased to approve your application and accept you into Green Tier. This letter of acceptance recognizes the value of 3M Cumberland's 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 and through your commitment to an Environmental Management System (EMS), you will systematically identify opportunities for environmental improvement. Your application describes a substantial list of environmental accomplishments including: reduced VOCs from your oven drying process, reduced water discharge quantities and associated solids to the Waste Water Treatment Plant through application of a non-stick coating on vessels, improved energy efficiency, and reduction of landfill waste. 3M Cumberland has a lengthy history of pursuing environmental excellence through your Environmental Targets Program. 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. Should circumstances arise that delay the fulfillment of these commitments, please notify us.

As a part of your commitments, you have agreed to submit to DNR an annual report regarding your participation in the program. These reports should document your current objectives and targets, as well as discuss any measured progress made toward those goals stated in your EMS or in your application. 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 to Mark McDermid with a copy to your single point of contact by March 15, 2010 and annually thereafter.

We also ask that you consider addressing the attached list of generic environmental indicators in your annual report, especially those related to 3M Cumberland's identified objectives and targets. This additional reporting is 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 success of the Green Tier program. If needed, the department will work with you to identify those indicators most relevant to your operations and critical to documenting program results.

You have identified a list of stakeholders which includes community officials, employees, customers and various government agencies. You utilize local news papers, Chamber of Commerce and plant tours to educate the community on environmental issues. 3M also utilizes its website to share corporate and local targets and goals which highlight your broader based approach to environmental, social and economic sustainability. 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 collaborate with stakeholders in the development of your objectives and targets. We also ask that you describe this and other communications with concerned entities in your annual report.

In recognition of 3M Cumberland's status 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 a violation of an existing environmental requirement, immediately provide us notice of your discovery along with a corrective action plan and a schedule for bringing 3M Cumberland back into compliance. DNR will not seek to impose penalties on you for the violation provided you successfully implement 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 guidelines provided for further information regarding the use of the logo. The department has committed to annually celebrate your participation in the program through a press release, and will publicize 3M Cumberland 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. As our working relationship evolves and specific environmental and business opportunities arise, please know the Green Tier program is prepared to help develop a customized working relationship with 3M Cumberland under the terms and conditions of Tier 2.

Sincerely,

/s/ Matthew Frank

Matthew J. Frank, Secretary
Wisconsin Department of Natural Resources

Attachments: Tier 1 Application
Generic Suite of Environmental Indicators
Green Tier Logo Files and Guidance CD

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	Title		
Keith Seelig	Mfg. Engineer		
Street Address	City	State	ZIP Code
1640 Western Avenue	Cumberland	WI	54829
Telephone Number	Fax Number	E-mail Address	
715-822-8501	715-8228506	kseelig@mmm.com	

II. Facility Information

Facility Name	County		
3M Cumberland	Barron		
Street Address	City	State	ZIP Code
1640 Western Avenue	Cumberland	WI	54829
Mailing Address	City	State	ZIP Code
Same as above			

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 <i>Thomas B. Harpist</i>	Date Signed <i>6/26/09</i>
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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

3M CUMBERLAND GREEN TIER- ATTACHMENT 2

ENVIRONMENTAL PERFORMANCE

AIR-

3M Cumberland Oven Capacity Project

A new oven configuration has provided operation flexibility to reduce certain oven zone temperatures and increase recycle air flow in the drying process. These adjustments reduced VOC generation within the oven and, because the air flow recycle loop passes through a burner, additional VOC reduction is being achieved by thermal oxidation.

2006- Baseline (pre-oven project)	55.7 Tons VOC emissions
2007-	34.9 Tons
2008-	31.7 Tons

WATER-

Suspended solids discharge is listed as a significant aspect in our EMS, therefore, this is considered an opportunity for continuous improvement. In order to minimize water discharge and associated solids discharge to the local POTW, process mixing vessels were coated with a specialized non-stick coating and the top of the vessels were lined with a sacrificial film barrier to allow for a "dry" cleaning process. After a mix is used, the vessel is allowed to dry and the residual is scrapped from the vessel and disposed. Additional water usage minimization projects include plans to separate solids from wash water by filter press or cyclonic separation and recycle the water back to the process.

LAND-

A new packaging container was redesigned which eliminated the use of an intermediate corrugated box that was part of a master container, this ultimately reduced downstream landfill waste by 18.5 tons.

NATURAL RESOURCES-

3M Cumberland is subject to Corporate initiatives such as Environmental Targets 2010 (ET10), this program sets and tracks environmental goals for all facilities which coincide with the Company's sustainability programs. The present targets are as follows:

- Reduce waste (non-product output) per pound of product by 20%
- Reduce volatile air emissions per pound of product output by 25%
- Improve energy efficiency per pound of product by 20%
- 800 accepted pollution prevention pays (3P).

The Cumberland facility also provided a grant to the local school district for a Community service day. This sponsored event served the Rice Lake/Cumberland, WI area where students, staff and volunteers worked on a variety of projects to maintain and improve the biodiversity of the community. This served to teach the participants important intangible lessons of taking ownership of the environment. Additionally, 3M Cumberland has taken on a partnership roll with the Island City Research Academy, a pilot program for the Cumberland School System providing a non-traditional alternative for 7th and 8th grade students. This program provides an environmental focus to teaching science, math, language arts, and social studies.

3M GREEN TIER- ATTACHMENT 3

ISO
CERTIFICATION

Certificate of Registration

ENVIRONMENTAL MANAGEMENT SYSTEM - ISO 14001:2004

Copy

This is to certify that:

3M Company
3M Cumberland Plant
1640 Western Avenue
Cumberland
Wisconsin
54829
USA

Holds Certificate No: **EMS 538960**

and operates an Environmental Management System which complies with the requirements of ISO 14001:2004 for the following scope:

The environmental management system associated with the manufacturing of floor maintenance finishing products; foam masking tape; plastic film and metallic foil laminates; and finishing and polishing abrasives at the 3M Company in Cumberland, WI, USA.

For and on behalf of BSI:



President, BSI Management Systems America, Inc.

Originally Registered: 03/01/2006

Latest Issue: 02/24/2009

Expiry Date: 02/28/2012



Page: 1 of 1

BSI

Management
Systems

This certificate remains the property of BSI and shall be returned immediately upon request.
An electronic certificate can be authenticated online. Printed copies can be validated at www.bsigroup.com/ClientDirectory.
To be read in conjunction with the scope above or the attached appendix.
Americas Headquarters: 12110 Sunset Hills Road, Suite 200, Reston, VA 20190, USA