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State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
FAX 608-267-3579
TTY Access via relay - 711



September 27, 2013

Katherine Donner,
The C.A. Lawton Co
1950 Enterprise Drive,
PO Box 5430,
De Pere, Wisconsin 54115

Subject: Welcome to Green Tier

Dear Ms Donner:

Congratulations! We are glad to welcome you into Tier 1 of the Green Tier Program. You join a group of companies who are not only committed to superior environmental performance but also to superior economic performance.

In recognizing your past accomplishments and future commitments the we promise to work toward promoting and recognizing your facility for taking the lead in environmental protection while assuring economic stability and growth. We are committed to publicizing C.A. Lawton as a Green Tier participant on the DNR website. Undoubtedly, there will be other opportunities to bring your accomplishments to the forefront, and we welcome the opportunity to do so.

Sally Hronek has been assigned as your single point of contact. She can be reached at (920) 662-5493 or at Sally.Hronek@Wisconsin.gov. Please contact Sally with any questions concerning communications, required approvals, or technical assistance you may need. For your convenience the attached Commitment Outline highlights your benefits and important dates that affect your participation.

On behalf of the Wisconsin Department of Natural Resources, I am proud to extend this welcome to you. We are committed to working with you to build a customized relationship under the Green Tier Program. I am excited to embark on our new relationship and my staff is ready to assist as your business grows.

Sincerely,

/s/ Cathy Stepp

Cathy Stepp
Secretary

Attachments: Commitment Outline
 Green Tier Logo Files and Guidance CD

Green Tier Commitment Outline for The C.A. Lawton Co

I. Approval Date – September 27, 2013

II. Green Tier - Tier 1 Program

- **Deferred Civil Action:** You are entitled to Deferred Civil Enforcement as described in statutes (299.83(6m)(d)). In brief, if you discover a violation of an existing environmental requirement, provide us notice of your discovery, a corrective action plan that you complete then DNR will not seek civil penalties.
- **Green Tier Logo:** Use of the Green Tier logo on materials related to your facility. The CD provided in your packet provides additional guidelines and information.
- **Single Point of Contact (SPOC):** **Sally Hronek - WDNR, (920) 662-5493, Sally.Hronek@Wisconsin.gov**. You should also feel free to call Tom Eggert, (608) 267-2761, thomas.eggert@wi.gov for any additional information you might need.
- **Minimum Inspection Frequency** – After you have implemented an EMS you are entitled to inspections at the lowest frequency permitted by the programs under law. We will work with you to determine how this will work for you.
- **Recognition** – Along with the numbered certificate of recognition, the department will host a participant web page for easy reference.

III. Environmental Management Systems (EMS)

- You have agreed to have your EMS in place on or before **October 1, 2014**.
- At least one time prior to **October 1, 2016**, and every third year after that, perform an environmental management system audit utilizing an outside environmental auditor approved by the Department.
- Please see guidance from the links below:
<http://dnr.wi.gov/topic/GreenTier/documents/provingEMS.pdf>
<http://dnr.wi.gov/topic/GreenTier/Auditors.html>

IV. Annual Reporting

- **First Annual Report Date** - By mutual agreement we have agreed that your first annual report will be due on June 30, 2014 and annually thereafter. (Please feel free to discuss alternative reporting dates with Tom Eggert (thomas.eggert@wi.gov) should your needs change.)
- Annually you will need to report progress on the commitments that you have made. You will need to report your progress on the specific commitments and information which will give us context for those commitments. If you have a goal to reduce energy consumption then the context would be total energy consumed. We will work with you to find the context reporting that will work best for you. For more details about Annual Reports and a metrics reporting spreadsheet, see:
<http://dnr.wi.gov/files/PDF/pubs/co/CO521.pdf>
<http://dnr.wi.gov/topic/GreenTier/documents/SustainabilityMetricsSpreadsheet.xlsx>
- Please provide your Green Tier Annual Reports to: greentier@wisconsin.gov, to Tom Eggert at thomas.eggert@wi.gov and to your SPOC at Sally.Hronek@Wisconsin.gov. Electronic submission is preferable.

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		
Katherine Donner	Compliance Coordinator		
Street Address	City	State	ZIP Code
1950 Enterprise Drive	De Pere	Wisconsin	54115
Telephone Number	Fax Number	E-mail Address	
(920)983-4095	(920)337-2477	kdonner@calawton.com	

II. Facility Information

Facility Name	County		
The C.A. Lawton Co	Brown		
Street Address	City	State	ZIP Code
1950 Enterprise Drive	De Pere	Wisconsin	54115
Mailing Address	City	State	ZIP Code
Post Office Box 5430	De Pere	Wisconsin	54115-5430

Please provide all DNR Facility Identification numbers (FID #) that apply to the covered facility or activity.
FID# 405005700

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

Katherine Donner, Compliance Coordinator 2/8/13

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

X. For Department Use Only

Date Received	Initials of Reviewer	Status	Date Returned to Applicant for Additional Information	Date Denied	Date Approved



THE C.A. LAWTON CO.

Scope of Green Tier Participation – In 2006, The C.A. Lawton Co. combined its small business entities, pattern making, iron foundry, and machine shop, into one integrated entity. The company campus includes two (2) facilities on three (3) contiguous properties. The addresses are:

The C.A. Lawton Co. - Foundry Operations
1900 Enterprise Drive
De Pere, Wisconsin 54115

The C.A. Lawton Co. – Administration, Pattern and Machining Operations
1950 Enterprise Drive
De Pere, Wisconsin 54115

All of the activities that take place at these locations are covered under The C.A. Lawton Co.'s Tier 1 Green Tier Application.



THE C.A. LAWTON CO.

(Attachment 2)

Environmental Performance – The C.A. Lawton Co. (Calco) is a foundry-centered manufacturer and integrated supplier of value-added services located in De Pere, Wisconsin. The Company was founded in the early 1880s. Corporate Values include Honesty, Caring, Improving, and Success. The Corporate Values of Caring and Improving directly address the company's commitment to its role as a conscientious corporate citizen and community member. As stated on the corporate website, "We care about our fellow stakeholders via safe and compliant operations," and "We apply our experience, intellect, work ethic, and capital to continually improve our products, services, and processes."

Environmental stewardship is fundamental in the way Calco runs its business. The company is focused on being an industry leader in sustainability and implementing cutting-edge business practices that respect limited resources. Calco strives to be a positive member of the community, and demonstrates that intent with programs that protect storm water runoff, air emissions, and waste management.

The Company aggressively pursues opportunities for improvement, part of which include efforts to minimize the effects of its operations on the environment. The philosophy of management is to actively identify sources of waste; be it energy, materials, labor, space, by-products, efficiency, etc.; and determine how to reduce, reuse, or eliminate that waste. Calco methodically accomplishes this with various preventative maintenance programs, audits by independent entities, and educating its workforce to recognize improvement opportunities.

In recent years, Calco has participated in several independent energy usage assessments. These assessments helped the company identify obsolete equipment, outdated management practices, and drains on resources. Two significant energy drains surfaced in these studies--an inadequate and inefficient compressed air system, and antiquated lighting.

The up-grade of the compressed air system was a multi-year process. The foundry operation was overhauled first, followed by a recent renovation of the machine shop system. Both operations were equipped with variable-speed drive compressors to maximize energy efficiency and compensate for wide swings in compressed air demand. For lighting, where deemed appropriate, old halogen light fixtures in both buildings have been replaced with high-efficiency lighting, and certain administrative areas are equipped with motion-sensor light fixtures to save energy when areas are unoccupied.

Other environmentally beneficial efforts undertaken by The C.A. Lawton Co. include replacement of the scrap metal pre-heater with a more efficient model, installation of an energy-draw limiter for the electric induction furnaces to manage peak energy demand, and utilization of heated ambient air from the compressor room to heat the shakeout and sand reclamation building of the foundry. Calco now diverts excess system foundry sand to beneficial reuse projects in nearby communities, where the material is used as sub-base for approved construction projects. Finally, in 2007-2008, the company invested in a combined casting shakeout and sand reclamation system. The new operation significantly reduces fugitive dust generation inside and outside the facility by automating and streamlining a manual process that previously took several operators to perform.

Looking into the future, The C.A. Lawton Co. continues to evaluate potential projects to reduce its environmental impact. One of those projects is to formalize the environmental management system. The rough structure is in place, but the goal is to make it more dynamic and interactive with operations.

Calco believes its employees are its most valued asset. Systematic training and education on recycling, universal waste, and material handling is on the docket to continue in 2013. Having a knowledgeable and environmentally sensitive workforce is an effective way to tap into valuable resources for idea generation and continuous improvement, because ideas with the highest impact come from those that "touch" the process.