



The C.A. Lawton Co.

Remarkable People. Remarkable Results.

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October 3, 2019

Ms. Laurel Sukup, Section Chief-Business Development
Wisconsin Department of Natural Resources
101 South Webster Street
P.O. Box 7921
Madison, WI 53707-7921

Re: Letter of Intent – Green Tier 2 Program

Dear Ms. Sukup:

The C.A. Lawton Co. (Calco) wishes to express, with this Letter of Intent, its desire to participate in the Green Tier Program as a Tier 2 business. We would like to take advantage of the new Registration Permit Type G, designed for Green Tier 2 facilities. The company understands that a Registration Construction Permit-G (RCP-G) issued by the Department is necessary to convert to an ROP-G. The ROP-G is an ideal fit for the Calco foundry operation because Particulate Matter Emissions (PM) and Volatile Organic Compounds (VOCs) annual emissions are well under the maximum threshold, and lead emissions are under 1,000 pounds per year. The company is also in the process of developing an integrated management system compliant with ISO 9001:2015 and ISO 14001:2015.

In order to allow time to complete the development and approval of the ISO 14001:2015 management system, Calco intends to obtain the Registration Construction Permit (RCP). Once the ISO 14001:2015 plan is approved, Calco will transition to the ROP-G. Approval of the ISO 14001:2015 management system will occur within the timeframe allowed under the RCP-G permit. Calco understands the importance of completing the transition to the ISO 14001:2015 EMS in a timely manner.

Calco joined Green Tier 1 program in September 2013. Since that time, the company implemented an audited, functionally equivalent ISO environmental management system, set objectives and targets that aim to reduce the business's impact on the environment, and trained employees on good environmental practices (recycling, energy conservation, emergency preparedness) that apply at home, as well as at work.

The elements of the Green Tier Letter of Intent for Level 2 participation is attached.

We will be completing the Green Tier Level 2 application form with the understanding that we are working toward the completion of our transition to the ISO 14001:2015 program.

Respectfully,

A handwritten signature in black ink that reads "S Perks".

Stephen Perks, Compliance Manager

Enclosure

GREEN TIER 2 LETTER OF INTENT ELEMENTS

1. Environmental criminal convictions – Prior 120 months
Response – none.
2. Environmental civil judgments – Prior 60 months
Response – none.
3. Wisconsin Department of Justice enforcement lawsuit/Wisconsin Department of Natural Resources enforcement – 24 months.
Response – none.
4. Environmental management status (EMS)
Response – audited, functionally equivalent EMS in place (Green Tier 1). Committed to upgrading to ISO14001:2015 as required by the RCP-G air permit. Audited EMS will be provided to the Department annually.
5. Annual compliance audit
Response – an annual compliance audit will be conducted and provided to the Department.
6. Superior environmental performance
Response –
 - (a) Trained employees on sustainable environmental practices.
 - (b) “Adopted” highway under the Wisconsin Department of Transportation Adopt A Highway program; employee teams clean two miles of highway (paid time) three times a year.
 - (c) Implemented a new ductile iron process that reduces raw material usage, energy consumption and particulate emissions; also allows for implementation of improved worker safety practices.
7. Involvement of interested persons
Response – Please see attached contract and signatures of interested parties
8. List of interested persons
Response – Mr. Michael Walsh, Mayor, City of De Pere, WI
Mr. Troy Strechenbach, Brown County Executive
Mr. Arthur A. Gibeaut, The C.A. Lawton Co. Board of Advisors
Mr. Randall Lawton, The C.A. Lawton Co. Board of Advisors
Mr. Mark Thimke, Attorney, Foley & Lardner, LLP
9. Contract provisions – ROP-G permit

10. Explanation of superior environmental performance proportional to ROP-G permit
Response – utilizing state-of-the-art environmental management systems combined with annual audits, The C.A. Lawton Co. will demonstrate a commitment to proactive environmental performance. The ROP-G/EMS approach allows for business growth, while continually improving environmental performance. In addition to the superior performance obtained through the effective use of ISO 14001:2015, the company will continue its Adopt-A-Highway commitment and the education of its employees on effective environmental stewardship approaches that can be used both in the workplace and at home.



GREEN TIER 2 - INTERESTED PARTIES AGREEMENT

1. Interested Parties

- 1.1 An important part of Green Tier 2 is the partnership agreement with DNR and our commitment to being transparent regarding our successes and achievements. Our environmental goal is to be committed to being a 'Good Corporate Citizen' and operate 'Beyond Compliance'.

We are committed to sharing our performance, including legal and other requirements that relate to our integrated management system (IMS) and applicable safety and environmental legislation.

We plan to invite our interested parties to attend our (IMS) management review in the spring of 2020. Our environmental management review will be compliant to the ISO 14001:2015.

Example of the management review criteria for our inputs

- a. Review previous minutes and actions
- b. Change in:
 - 1. External and internal issues that are relevant to the environmental/safety management system;
 - 2. The needs and expectations of interested parties, including compliance obligations;
 - 3. Significant environmental aspects;
 - 4. Risk and opportunities;
- c. Report out on environmental/safety objectives
- d. information and progress on environmental/safety performance, including trends:
 - 1. Nonconformities and corrective actions;
 - 2. Monitoring and measurement results;
 - 3. Fulfilment of compliance obligations;
 - 4. Audit results
- e. Adequacy of resources;
- f. Relevant communication from interested parties, including complaints;
- g. Opportunities for continual improvement.

Green Tier (DNR) and Interested Parties will help our organization accomplish our goals by providing feedback that relates to our environmental performance and experience. This partnership will demonstrate that we endeavor to minimize the impact to the environment through the decisions we make.

DNR will communicate with interested parties about the public comment period related to our Green Tier application.

2. Arrangements

- 2.1 We, the undersigned, are committed to consult with and provide feedback to The C.A. Lawton Co., including the evaluation of legal and other requirements that impact internal and external inputs and outputs. This will involve, but not be limited to, selection, training, re-training, supporting and continuous assessment of The CA Lawton performance.



GREEN TIER 2 - INTERESTED PARTIES AGREEMENT

2.2 We, the undersigned will periodically review this agreement by auditing and effectively monitoring The C.A. Lawton Co. integrated management system.

Name: Mr. Alexander Lawton
Position: CEO
Signed [Signature] Date 9-19-19

Name: Mr. Barry Adamski
Position: President
Signed [Signature] Date 9/18/19

Name: Mr. Michael Walsh
Position: De Pere Mayor
Signed [Signature] Date 9/13/19

Name: Mr. Troy Strechenbach
Position: Brown County Executive
Signed [Signature] Date 9/13/19

Name: Mr. Brian J. Bruess
Position: President of St. Norbert College
Signed _____ Date _____

Name: Mr Mark A Thimke
Position: Attorney, Foley & Lardner LLP
Signed [Signature] Date 9/13/19

Name: Mr. Randall Lawton
Position: Board of Advisors
Signed [Signature] Date 9/18/19

Name: Mr. Arthur A. Gibeaut
Position: Board of Advisors
Signed [Signature] Date 9/30/19

Name: Mr. Stephen Perks
Position: Compliance Manager
Signed [Signature] Date 9/18/19