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Green Tier Commitment Outline for Cardinal Insulated Glass, Spring Green Facility (SGIG)

Approval Date – December 17, 2010

Commitment Outline Updated: 2/13/2020

The updates since participation started are:

- Updated general content, format and links
- Change of audit due date from 12/17 to 3/30 starting in 2018.

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/CO503.pdf>

You have agreed to implement your EMS on or before **December 17, 2011**. Within 30 days please email your EMS implementation date to: GreenTier@Wisconsin.gov, your Project Coordinator, Shelley.Heilman@Wisconsin.gov and your Single Point of Contact (SPOC), Dan Bekta, Eugene.Bekta@Wisconsin.gov.

To maintain good standing with Green Tier EMS requirements:

- A. On or before **December 17, 2011** and every year after that, perform an environmental management system audit. The department recommends that your first audit 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>
- B. On or before, **December 17, 2013** and every third year, this audit **must** be completed by a DNR-approved outside EMS auditor.

II. Provide an Annual Report

- A. **Annual Report Due Date** - We have mutually agreed that for 2011 you will provide a summary of your pre-existing goals in lieu of an annual report. The deadline for your first Green Tier annual report is **March 31, 2012** and annually thereafter. (Please feel free to discuss alternative reporting dates with your Project Coordinator, Shelley.Heilman@Wisconsin.gov should your needs change.)

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. **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>

- B. Please submit Green Tier Annual Reports to: GreenTier@Wisconsin.gov, and your Single Point of Contact (SPOC), Eugene.Bekta@Wisconsin.gov.

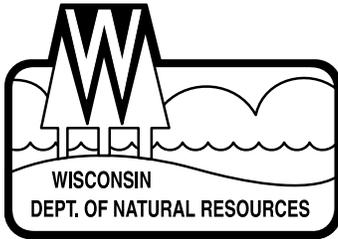
III. Work toward Superior Environmental Performance

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: Dan Bekta - DNR, Phone: 608-275-3201, Cell: 608-333-6579, Eugene.Bekta@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: Shelley Heilman, Phone 608/267-0873, Shelley.Heilman@Wisconsin.gov
- E. **Minimum Inspection Frequency:** When 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

December 17, 2010

Mr. Richard Valtierra
Plant Manager
Cardinal SGIG
1011 East Madison St.
Spring Green, WI 53588

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Mr. Valtierra:

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 Cardinal SGIG'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. Cardinal SGIG commits through its EMS to establish processes and practices that enable them to increase operational efficiency, reduce environmental impacts and ensure regulatory compliance. The system consists of four major programs, Pollution Prevention, Energy Management, Raw Material Certification and Water Management. In addition, Cardinal SGIG has stated a goal to develop a community sustainability outreach program. By December 17, 2011, your EMS should either be certified to the ISO 14001 standard or documented as functionally equivalent (see attached guidance). 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 31, 2012 and annually thereafter. We understand that Cardinal SGIG has set a number of goals for 2010 and would appreciate receiving a summary of the progress made on those goals in lieu of an annual report in 2011.

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		
Eric Fortin	Director of Sustainability		
Street Address	City	State	ZIP Code
1011 East Madison Street	Spring Green	WI	53588
Telephone Number	Fax Number	E-mail Address	
608-588-9588 ext. 350	608-588-3864	efortin@cardinalcorp.com	

II. Facility Information

Facility Name	County		
Cardinal IG	Sauk		
Street Address	City	State	ZIP Code
1011 East Madison Street	Spring Green	WI	53588
Mailing Address	City	State	ZIP Code
1011 East Madison Street	Spring Green	WI	53588

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

1462

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 | <input checked="" type="radio"/> No | (circle one) |
| b. Have you implemented an EMS that is functionally equivalent to ISO 14001? | Yes | <input checked="" type="radio"/> 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 08/30/20
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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

Cardinal SGIG Environmental Performance

- Hired a third party environmental engineer to conduct an environmental impact assessment of our facility and process. This was conducted in March 2009. The results of the assessment, or Register of Legislation, identified two areas of focus. Level 1 Improvements are improvements with significant or legal impacts. Level 2 Improvements are improvements that warrant immediate study. In addition, a recurring reports and records worksheet was developed. The Register of Legislation quickly identified our current position regarding environmental compliance, but also provided the tools necessary to establish an environmental management system (EMS).
- Using the Register of Legislation, we created the Spring Green Insulated Glass (SGIG) Environmental Management System. The purpose of the SGIG EMS is to establish the processes and practices that enable SGIG to increase its operational efficiency, reduce its environmental impacts, and ensure regulatory compliance. The SGIG EMS team consists of the following programs:
 - Pollution Prevention
 - Energy Management
 - Raw Material Certification
 - Water/Waste Water Management (new program)
- The SGIG EMS is built around the “Plan, Do, Check, Act” model to ensure that environmental matters are systematically identified, controlled, and monitored. This will help ensure that SGIG environmental performance benefits the plant and improves over time.

- Employee communication about our EMS efforts and progress is shared quarterly during our weekly employee communication meetings. Results and progress is also displayed on our break room information monitors.
- The SGIG EMS team developed the SGIG EMS Compliance Program. The EMS Compliance Program has addressed each of the Level 1 and Level 2 improvements that were identified in the Register of Legislation. The Program was developed from the Register of Legislation by breaking down the Level 1 and Level 2 improvements into specific areas of responsibility throughout or facility.
- The EMS Compliance Program utilizes an internal (the SGIG Continuous Improvement (CI) team) and external (3rd party environmental engineer firm) audit program to ensure compliance with all environmental requirements.
- The focus and direction for the EMS team is provided by our annual strategic plan. The strategic plan outlines specific goals for each of the EMS programs. As part of our EMS program, we developed the SGIG Sustainability Board. The board meets quarterly to review the progress of environmental projects and also the efforts towards accomplishing the EMS strategic objectives. The EMS strategic goals for 2010 are as follows:
 - Pollution Prevention- Reduce waste to the landfill to 0.30 lbs/square foot produced
 - Energy Management- Reduce energy consumption (KWH/square foot produced) 25% from the 2008 baseline by the end of 2013.
 - Raw Material Certification- Develop an audit and measure supplier sustainability programs.
 - Water/Waste Water Management- New program

- Pollution Prevention projects completed or in progress
 - Decreased waste to the landfill by 50%, over 300 tons per year reduction.
 - Implemented extensive recycling program separating and collecting over 25 different items throughout the facility, internally consolidated and packaged for shipment.
 - Conducted paperwork reduction events (decreased paperwork on outgoing finished racks by 75%, paperwork to the production lines by 60%).
 - Began backhauling program from customers in order to re-use packing material.
 - Started collection program for customers to recycle unusable product.

- Energy Management projects completed or in progress
 - 4 x VFDs installed on tempering furnace blowers.
 - Custom modification to our tempering furnace to be more energy efficient.
 - Installed 248 occupancy sensors throughout the facility.
 - Installed 15 new and more efficient HVAC units.
 - In the process of installing a HVAC control system to better manage our HVAC system.
 - In the process of replacing all front office windows to improve insulated value and reduce solar heat gain.
 - Conducted a compressed air system leak audit and repaired all leaks.
 - In the process of upgrading/updating our compressed air system to improve efficiency and reduce energy use.
 - In the process of metering all processes used during the peak demand hours to identify opportunities to shift processes to off-peak hours.

- Raw Material Certification program progress
 - Developed and fielded a supplier self-assessment report card for our suppliers to grade themselves on sustainability.
 - Developing a report card grading program to rate all current suppliers on their sustainability performance.
- Water/Waste Water Management program- The program is in development with a manager to be identified in the next two weeks.
- Additional goals for 2010 consist of develop a community sustainability outreach program and to be certified by the Wisconsin DNR Green Tier program (Tier 1).



Memo

Cardinal SGIG

To: All Personnel
From: Rich Valtierra
Date: 8/30/2010
Re: Facility Environmental Management Policy

SGIG is the first Cardinal facility to establish an environmental program. During the past two years we have been busy assessing our environmental impacts and taking action to improve our environmental performance. As the company leader in sustainability efforts, we will continue to strive to minimize our environmental impacts and share the methods and the results of our efforts with others who are interested. Our goal is to ensure “green practices- products and processes that have minimal impact on the health of the ecosystem- recyclable, reusable and energy efficient.” (2008 Aberdeen Group) A breakdown of our efforts and our Environmental Management System is as follows.

In 2009 SGIG established the SGIG Environmental Management System. The purpose of the SGIG EMS is to establish the processes and practices that enable SGIG to increase its operational efficiency, reduce its environmental impacts, and ensure regulatory compliance. The EMS consists of the following programs:

- Pollution Prevention
- Energy Management
- Raw Material Certification
- Water Management (new program)

Employee communication about our EMS efforts and progress is shared quarterly during our weekly employee communication meetings and also displayed on our break room information monitors. The SGIG EMS is built around the “Plan, Do, Check, Act” model to ensure that environmental matters are

systematically identified, controlled, and monitored. This will help ensure that SGIG environmental performance benefits the plant and improves over time.

In 2010, the SGIG EMS team developed the SGIG EMS Compliance Program. The EMS Compliance Program was developed from our Register of Legislation. The Register of Legislation was developed by a third party upon the completion of an environmental impact assessment of our facility and process. Our Compliance Program was developed by breaking down the Level 1 improvements (improvements with significant or legal impacts) and Level 2 improvements (improvements that warrant immediate study) into specific areas of responsibility throughout our facility. The purpose of our EMS Compliance Program is to ensure compliance of all Level 1 improvements and the study of all Level 2 improvements from the Register of Legislation. The EMS Compliance Program utilizes an internal and external audit program to ensure compliance.

The focus and direction for the SGIG EMS team is provided by our annual strategic plan. The strategic plan outlines specific goals for each of the EMS programs. As part of our EMS program, we developed the SGIG Sustainability Board. The board meets quarterly to review the progress of environmental projects and also the efforts towards accomplishing the EMS strategic objectives. The strategic goals for our EMS in 2010 are as follows:

- Pollution Prevention- Reduce waste to the landfill to 0.30 lbs/square foot produced.
- Energy Management- Reduce energy consumption (KWH/square foot produced) 25% from the 2008 baseline by the end of 2013.
- Raw Material Certification- Develop an audit and measure supplier sustainability programs.
- Water Management- New program.

Additional goals for 2010 consist of develop a community sustainability outreach program and to be certified by the Wisconsin DNR Green Tier program (Tier 1).