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## Green Tier Commitment Outline for Cortec Coated Products – Eau Claire WI

Approval Date – June 18, 2010

Commitment Outline Updated: 02/17/2020

The updates since participation started are:

- Change of single point of contact
- Change of product coordinator
- EMS established
- 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/CO503.pdf>

You have agreed to implement your EMS on or before **June 1, 2011**. Within 30 days please email your EMS implementation date to: [GreenTier@Wisconsin.gov](mailto:GreenTier@Wisconsin.gov), your Project Coordinator, [JenniferA.Birkholz@Wisconsin.gov](mailto:JenniferA.Birkholz@Wisconsin.gov) and your Single Point of Contact (SPOC), [Robert.Germer@Wisconsin.gov](mailto:Robert.Germer@Wisconsin.gov).

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **June 1, 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, **June 1, 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 the deadline for your Green Tier annual report is **April 1, 2011** and annually thereafter. (Please feel free to discuss alternative reporting dates with your Project Coordinator, [JenniferA.Birkholz@Wisconsin.gov](mailto: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 submit Green Tier Annual Reports to: [GreenTier@Wisconsin.gov](mailto:GreenTier@Wisconsin.gov) and your Single Point of Contact (SPOC), [Robert.Germer@Wisconsin.gov](mailto:Robert.Germer@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: Bob Germer - DNR, Phone 715-635-4060, [Robert.Germer@wisconsin.gov](mailto:Robert.Germer@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](mailto:JenniferA.Birkholz@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

6/18/10

Tamara Scales  
Regulatory QMS/EMS Administrator  
Cortec Coated Products  
3431 Hogarth St.  
Eau Claire, WI 54701

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Ms. Scales:

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 Cortec Coated Products'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. After having already recognized reductions of more than 223,000 kilowatt-hours of electricity and 175,000 terms of natural gas annually, your goals of continued energy reduction is exciting. In addition, you plans of improving you facilities recycling program will have meaningful impacts on you waste reduction. By 6/1/11, 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 4/1/11 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 Cortec Coated Product'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.

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. The department can provide assistance in forming such a group should you require it. We also ask that you describe this and other communications with concerned entities in your annual report.

In recognition of Cortec Coated Product'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 Cortec Coated Product's 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 Cortec Coated Products. 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 Cortec Coated Product's as a Green Tier participant on the DNR website.

Finally, Laurel Sukup has been assigned as your single point of contact. She can be reached at 608-267-6817 or at [laurel.sukup@wisconsin.gov](mailto:laurel.sukup@wisconsin.gov). Please contact Laurel 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 Cortec Coating Products 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  
EMS Functional Equivalency Guidance  
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			
Tamara Scales	Regulatory QMS/EMS Administrator			
Street Address	City	State	ZIP Code	
3431 Hogarth St	Eau Claire	WI	54703	
Telephone Number	Fax Number		E-mail Address	
715-858-0690 EXT 428	1-715-858-0417		tscales@cortecvci.com	

## II. Facility Information

Facility Name			County	
Cortec Coated Products				
Street Address	City	State	ZIP Code	
3431 Hogarth St	Eau Claire	WI	54703	
Mailing Address	City	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 3<sup>rd</sup> 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

## 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



## ATTACHMENT II

Cortec Coated Products receives many of our energy projects/ideas from our employees. Energy brainstorming spreadsheets are posted in our break rooms on our EMS board. Everyone has a say on how we can improve our environment. With these ideas, our plans are put in place to make them become realities.

Our efforts have reduced non-renewable resources of solid waste through measurable processes of recycling. We continue to reduce the generation of waste streams at the facilities and we remain actively involved in the reduction of our dependence for energy required to operate this facility.

Other successes that achieve measured reductions of responsible environmental stewardship and continuous improvements, are our initiatives to monitor paper recycling, proper recycling of electronic wastes (computers and related equipment) use of recycled copy machine paper. We recycle all oils, anti-freeze, part cleaning solution, cardboard and other forms of universal wastes. We also implemented an environmentally safe disposable aerosol can unit.

Cortec Coated Products facility has implemented-(See Press Release)

- Steam trap rebuilding for energy efficiency.
- Process heat-recovery system. Which uses reuses recovered heat from the process and cuts energy usage by 50%.
- A 40,000 cfm dual fuel air make-up unit which utilizes recovered process heat to heat our 56,000sq ft plant when processes are in operation. During non production time a high efficiency natural gas heating system is used.
- Installation of LED exit lights and emergency light packs, the replacement of metal halide lights with energy high efficiency T8 fluorescent fixtures; these new fixtures provide us much more illumination with substantially less energy consumption. With savings up to 40% of energy costs over metal halide fixtures. We also zoned off lights within the plant to reduce usage where not needed.
- Focus on Energy gave Cortec Coated Products a total of \$99,000 in rebates for installation of these systems.



Moving forward, Cortec Coated Products will continue to achieve superior performance through continuous improvement processes we will focus our efforts on the reduction of waste generation, reductions of energy use, continued exploration of new recycling options and implementing best practices for the betterment of our relationship with the environment, our employees, community, and customers.

For additional detail, please contact Tamara Scales at (715)-858-0690 Ext 428

### ATTACHMENT III



## **EMS Objectives and Targets**

### **Cortec Coated Products Objects**

Waste Reduction- Improve on lowering our waste to decrease unneeded waste in landfills.

Recycling- Educating our employees on needed recycling efforts and how we can improve.

Energy Reduction- Lower our energy bills which will have an effect on the bottom line & decrease the usage of oil/gas while reducing hydrocarbon emission.

### **How can Cortec Coated Products lower their waste consumption and improve recycling?**

1. Employee training-
  - a. Training with new hired employee
  - b. Training for hazardous Waste and Universal Waste.
2. Postings in our Break room
  - a. Awareness on waste reduction.
  - b. Recycling information.

### **How is Cortec Coated Products going to Reduce Energy Costs?**

1. Employee Energy Brainstorming
  - a. A posting is being generated in our break room with energy reduction ideas.
2. Perform necessary PM's on all HVAC, Electrical switchgear and other infrastructure.
3. Installation of chilled water pipes.
4. Complete Installation of steam pipes.
5. Replacing all worn out exhaust fan dampers to maintain building pressure when fans are not in use.
6. Participate in Cortec Corporation's Environmental Steering Committee.



## ATTACHMENT IV

# Environmental Policy

*At Cortec Coated Products, we are committed to:*

- Developing, implementing and reviewing a plan that defines the organization's environmental goals, objectives and targets
- Preventing environmental pollution and conservation problems
- Conserving natural resources through reclamation and recycling
- Complying with all legal and other requirements that apply to the organization's operations related to its environmental aspects
- Continual improvement of the environmental performance of our products, services, and processes
- Assisting our customers in dealing with environmental challenges
- The continued development of products that are created from sustainable resources