

## Table of Contents

---

Acceptance letter

Commitment outline

Application

Attachment 2



09/05/2017

John Opiela  
Facility Manager  
Kimberly-Clark Kimtech  
1109 Henry St  
Neenah, WI 54956

Subject: Welcome to Green Tier – Tier 1

Dear Mr. Opiela,

Congratulations! We are glad to welcome Kimtech into Tier 1 of Green Tier. You join a select group of participants who are committed to superior environmental performance.

To recognize your environmental accomplishments and your commitment to future environmental performance, we will highlight your Kimtech successes on the Department of Natural Resource's Green Tier website. This will help you document your progress overtime.

Each Green Tier participant is matched with a single point of contact at DNR. Jean Romback-Bartels has been assigned as your single point of contact. She can be reached at (920) 662-5114 or at [jean.rombackbartels@wisconsin.gov](mailto:jean.rombackbartels@wisconsin.gov). Please contact her with any questions concerning communications, required approvals, or technical assistance you may need.

For your convenience, we have attached a Commitment Outline. This document identifies the benefits of being part of Green Tier and important dates that affect your participation.

Again, welcome to the Green Tier program. My staff and I are excited to embark on our new relationship with you. We look forward to assisting you with your commitment to continuous improvement and superior environmental performance.

Sincerely,

/s/ Cathy Stepp

Cathy Stepp  
Secretary

Cc: Laurel Sukup  
Jean Romback-Bartels  
File

Attachments: Green Tier Commitment Outline  
Green Tier Logo Files and Guidance CD  
Green Tier Annual Report Guidance

## Green Tier Commitment Outline for Kimberly-Clark – Kimtech Facility

Approval Date – September 8, 2017

Commitment Outline Updated: 2/5/2020

The updates since participation started are:

- Change of project coordinator
- Change of annual report due date
- 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 demonstrated that your EMS is functionally equivalent, satisfying initial Green Tier EMS requirements.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **September 8, 2018** 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 EMS auditor.
- B. On or before, **September 8, 2020** 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 **January 31st** 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 provide annual Green Tier Reports to both of these email addresses: [GreenTier@Wisconsin.gov](mailto:GreenTier@Wisconsin.gov) and to your Single Point of Contact, [Jean.RombackBartels@Wisconsin.gov](mailto:Jean.RombackBartels@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: Jean Romback-Bartels - DNR, Phone 920-662-5114, Cell 920-360-8082, [Jean.RombackBartels@Wisconsin.gov](mailto:Jean.RombackBartels@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:** 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

**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 John Opriela	Title Facility Manager		
Street Address 1109 Henry St	City Neenah	State WI	ZIP Code 54956
Telephone Number 920-721-3301	Fax Number	E-mail Address jopriela@kcc.com	

## II. Facility Information

Facility Name Kirmtech Facility		County Winnebago	
Street Address 1109 Henry St	City Neenah	State WI	ZIP Code 54956
Mailing Address Same	City	State	ZIP Code

Please provide all DNR Facility Identification numbers (FID #) that apply to the covered facility or activity  
FID# 471032540

## 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 (select one)
- b. Have you implemented an EMS that is functionally equivalent to ISO 14001?  Yes  No (select 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 Involvement

Please provide in a separate document labeled **Attachment 4** a list of interested persons whom you know or expect will have a strong interest in your Green Tier application. Tier 2 applicants must provide additional information about interested person 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.

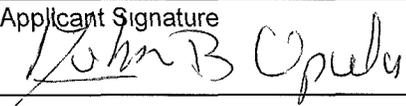
- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

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:

- a. 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.
- b. Conduct annual EMS audits, with every 3<sup>rd</sup> EMS audit performed by a DNR-approved outside environmental auditor.
- c. Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- d. 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 3-10-2017
--	--------------------------

## 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:

- a. Conduct annual EMS audits performed by a DNR-approved outside environmental auditor.
- b. 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.
- c. Submit to DNR an annual report on each EMS audit that is in compliance with s. 299.83(6m)(a), Wis. Stats.
- d. 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

# Kimberly-Clark – Kimtech Plant

## Attachment 2

1. 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.

### Past and Current Environmental Performance

Kimtech developed an environmental management system (EMS) in January of 2017 (outline included below) which is consistent with the “functional equivalency” requirements of Wisconsin Statute §299.83(1)(dg). EMS implementation is currently in progress.

KC EHS MS Element	Document
1.0 - Policy and Organization	1.1 EHS Policy
	1.2 EMS Roles and Responsibilities
	1.3 EHS Steering Committee
	1.4 Employee Involvement
2.0 - Planning	2.1 Identification of Regulatory and Other Requirements
	2.2 Aspects and Impacts
	2.3 Critical Environmental Task Analysis
	2.4 Critical Environmental Equipment
	2.5 Environmental Improvement Plan
3.0 - Implementation and Operation	3.1 Training
	3.2 Communication
	3.3 Document Control
	3.4 Operational Control
	3.5 Emergency Response
4.0 - Checking and Corrective Action	4.1 Monitoring and Measuring
	4.2 Evaluation of Regulatory Compliance
	4.3 Incident Investigation
	4.4 Planned Inspections
	4.5 Corrective-Preventive Action
	4.6 EMS Self-Assessments
5.0 - Management Review	5.1 Management Review

# Kimberly-Clark – Kimtech Plant

## Attachment 2

The Kimberly-Clark Corporate Vision Program is used as a baseline for development of environmental objectives and targets for NCSF.

	2022 Goal	Units
	Improve the lives of 25M people in need	Lives Impacted
	50% reduction in natural forest fiber use	% Reduction
	Avoid landfilling of 150,000 MT of product and packaging material post-use	Metric Tons
	25% reduction in greenhouse gas emissions	% Reduction
	Water efficiency targets Social & Environmental Compliance Improvement	Number of Mills

### Energy Reduction Programs

- 2016/17 - Light fixture changes (energy reduction)

### Waste Minimization and Management

- Recycle 99% of manufacturing waste
  - Cardboard
  - Poly-wrap
  - Packaging material
  - Scrap wood product
  - Other

## Kimberly-Clark – Kimtech Plant

### Attachment 2

- Recycle 100% Universal Waste
  - Lamps and bulbs
  - Batteries
- Recycle 100% of used oil and anti-freeze
- Recycle 100% scrap metal waste
- Recycle 100% office waste
- Continuing program to puncture and drain aerosol cans and recycle empty cans as scrap metal.

2. *Describe your future plans for enhancing the environment with respect to the same facilities/activities.*

Kimtech will maintain and improve our environmental performance by:

- Training employees on their roles to assist in maintaining a facility that is environmentally compliant
- Continue our commitment to the NCSF EMS
- Continue reduction of energy consumption
- Maintain compliance with NCSF EHS Policy Statement
- Continue waste minimization efforts