Table of Contents

Acceptance letter

Commitment outline

Application

Attachment 2

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

09/18/15

Paul Lombardi, Plant Manager
Kimberly-Clark Neenah Cold Spring Facility
1050 Cold Spring Road
Neenah, WI, 54956

Subject: Welcome to Green Tier – Tier 1

Dear Mr. Lombardi:

Congratulations! We are glad to welcome you into Tier 1 of Green Tier. 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 we promise to work towards promoting and recognizing your facility for taking the lead in environmental protection while assuring economic stability and growth. We are committed to publicizing Kimberly Clark's Neenah Cold Spring Facility.

Kimberly-Clark's Neenah Cold Spring Facility will be listed as a Green Tier participant on the DNR website. Undoubtedly, there will be other opportunities to bring attention to your accomplishments, and we hope to assist you in doing so as a Green Tier partner.

Jennifer Borski has been assigned as your single points of contact. Jennifer can be reached at (920) 424-7887 or at Jennifer.Borski@Wisconsin.gov. Please contact her with any questions concerning communications, required approvals, or technical assistance you may need. For your convenience the attached Commitment Outline points out 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

Cc: Laurel Sukup
Jennifer Borski

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

Green Tier Commitment Outline for
Kimberly Clark – Neenah Cold Spring Facility

Approval Date – September 18, 2015

Commitment Outline Updated: 2/5/2020
The updates since participation started are:

- Change of annual report due date
- Change of single point of contact
- Change of project coordinator
- 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 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 18, 2016** 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 18, 2018** and 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.** (Please feel free to discuss alternative reporting dates with your Project Coordinator, 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 and to your Single Point of Contact, 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

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

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

State of Wisconsin
Department of Natural Resources
P.O. Box 7921, Madison WI 53707-7921
http://greentier.wi.gov

Green Tier Application

Form 4800-022 (Rev. 9/09)

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		
Paul Lombardi	Plant Manager		
Street Address	**City**	**State**	**ZIP Code**
1050 Cold Spring Road	Neenah	WI	54956
Telephone Number	**Fax Number**	**E-mail Address**	
920-721-6399		Paul.Lombardi@kcc.com	

II. Facility Information

Facility Name		County	
Neenah Cold Spring Facility - NCSF		Winnebago	
Street Address	**City**	**State**	**ZIP Code**
1050 Cold Spring Road	Neenah	WI	54956
Mailing Address	**City**	**State**	**ZIP Code**
1050 Cold Spring Road	Neenah	WI	54956

Please provide all DNR Facility Identification numbers (FID #) that apply to the covered facility or activity.
FID - 471109540

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 3rd 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
Paul Lombardi	3/25/2015

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
	3/25/2015

X. For Department Use Only

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

Kimberly-Clark - Neenah Cold Spring Facility (NCSF)

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

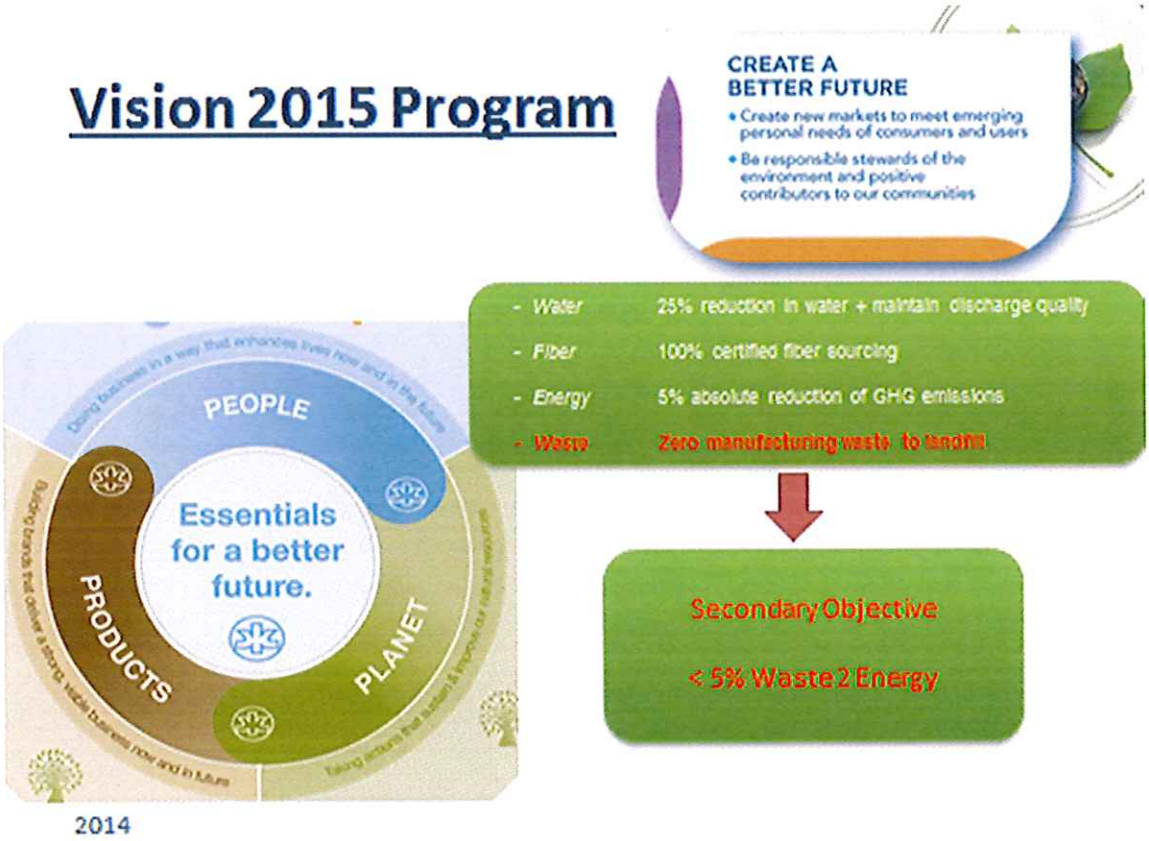
NCSF developed an environmental management system (EMS) in January of 2015 (outline included below) which is consistent with the "functional equivalency" requirements of Wisconsin Statute §299.83(1)(dg). EMS implementation is currently in progress.

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 - Neenah Cold Spring Facility (NCSF)

Attachment 2

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



Energy Reduction Programs

- 2006 - Installed occupancy sensors for office and other lighting
- 2007 - Eliminated unit substation transformer overloads
- 2007 - Eliminated outdoor transformer overloads
- 2007 - Replaced electrical compressed air dryers by heat of compression air
- 2007 - Installed duplex flow controller for compressed air
- 2007 - Electrical power factor correction (more efficient usage of energy)
- 2009 - Chilled water distribution upgrades
- 2009 - Installed hot gas bypass on chillers
- 2009 - Process HVAC economizer mode on some units (use outside air)
- 2009 - L15 Process HVAC air distribution upgrades
- 2010 - Installed cooling tower recovery stacks (increased efficiency)
- 2011 - Boiler upgrades (2) (efficiency, energy reduction)
- 2011 - Chillers soft start (efficiency, energy reduction)
- 2012 - L14 Process HVAC air distribution upgrades
- 2012 - Process HVAC economizer mode on pants (use outside air)
- 2010-11 - Expansion, use of high efficiency motors (if more than 50HP)

Kimberly-Clark - Neenah Cold Spring Facility (NCSF)

Attachment 2

- 2010-11 - Expansion, use of VFDs instead of fixed speed on all air system motors
- 2009-2012 - Process HVAC optimization (more efficient use of energy)
- 2009-2012 - Compressed air leak detection and fixes (energy reduction)
- 2009-2012 - Production waste and delay reduction (less energy per produced unit)
- 2009-2012 - Light fixture changes (energy reduction)

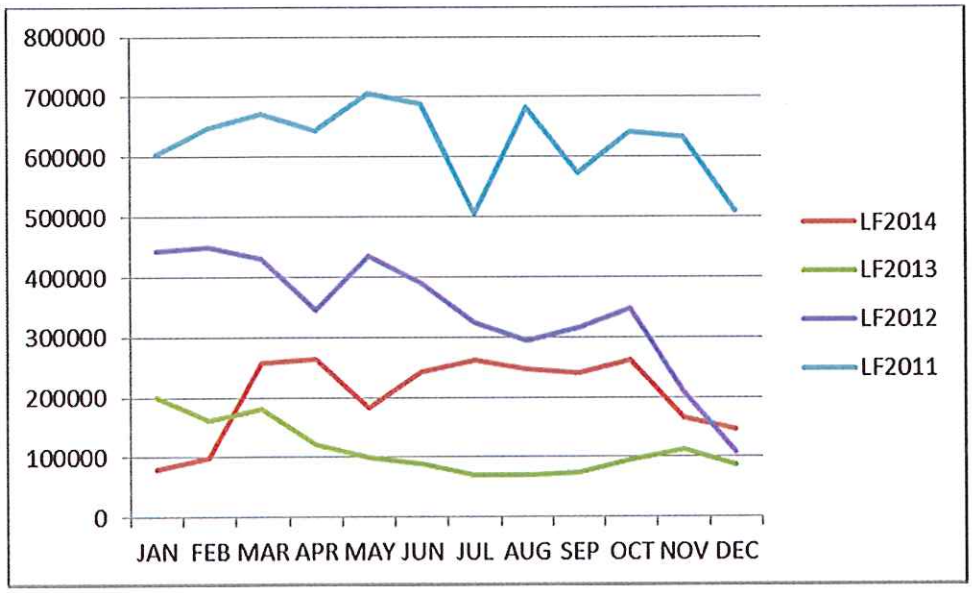
Air Emission Reduction Programs

- 2008 - Added MRF1 dust collector and briquetter (reduce emissions)
- 2008 - Replaced drum filters with bag houses on L10-13-21-22 (reduce emissions)
- 2012 - MRF1 dust filtration upgrades (efficiency, reduce emissions)

Waste Minimization and Management

- 2011 - Super suckers installed on pant machines (landfill reduction)
- 2012 - Color coded recycling bins purchased
- 2012 - Bale project (landfill reduction)

The graph below shows NCSF's declining landfill contribution (in pounds) since 2011.



- Recycle 97% of manufacturing waste
  - Product cut outs
  - Cardboard
  - Poly-wrap
  - Packaging material
  - Scrap wood product

- 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.*

NCSF 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