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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



November 21, 2014

Clare Welty
KS Kolbenschmidt US
1731 Industrial Parkway
Marinette, WI 54143

Subject: Welcome to Green Tier – Tier 1

Dear Ms. Welty:

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 KS Kolbenschmidt US 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.

Michelle Farley has been assigned as your single point of contact. She can be reached at (920)662-5495 or at Michelle.Farley@wisconsin.gov. Please contact Michelle 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: Tom Eggert
Michelle Farley

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

Green Tier Commitment Outline for KS Kolbenschmidt US, Inc.

Approval Date – November 21, 2014

Commitment Outline Updated: (02/07/2020)

The updates since participation started are:

- Updated general content, format and links
- Updated Project Coordinator
- Updated Annual Report Date
- Updated EMS Audit Dates

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 supplied us with a copy of your ISO 14001 certification, satisfying initial Green Tier EMS requirements.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **November 21, 2015** 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 environmental auditor.
- B. On or before, **November 21, 2016** 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 31**. (Please feel free to discuss alternative reporting dates with your Project Coordinator 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: GreenTier@Wisconsin.gov and your Single Point of Contact.

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: Michelle Farley, Phone 920 - 662 - 5495, Michelle.Farley@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: Weston Wegener, Phone: 608-264-9753, Cell: 608-284-0908, Weston.Wegener@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 | Title | | |
| Clare Welty | Organizational Talent Development Manager | | |
| Street Address | City | State | ZIP Code |
| 1731 Industrial Parkway | Marinette | WI | 54143 |
| Telephone Number | Fax Number | E-mail Address | |
| 715-735-1098 | | clare.welty@us.kspg.com | |

II. Facility Information

| | | | |
|---------------------------|-----------|-------|----------|
| Facility Name | County | | |
| KS Kolbenschmidt US, Inc. | Marinette | | |
| Street Address | City | State | ZIP Code |
| 1731 Industrial Parkway | Marinette | WI | 54143 |
| Mailing Address | City | State | ZIP Code |
| Same as above | | | |

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

438006580

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 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


Mark Jurman Plant Manager

Date Signed

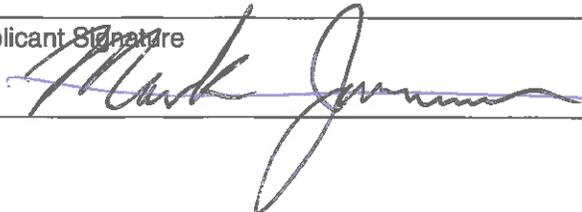
8-18-14

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

8-18-14

X. For Department Use Only

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



Attachment I

KS Kolbenschmidt US, Inc. (KS KUS) manufactures automotive pistons. Production activities include an aluminum foundry and machining of aluminum and steel pistons. The facility is located at 1731 Industrial Parkway in Marinette, Wisconsin. The scope of the Environmental Management System and Green Tier participation covers all activities at this location.

Attachment II

KS KUS will be celebrating their 70th anniversary during the summer of 2014. Throughout this history, KS KUS has responded to increased awareness of environmental impacts throughout the automotive industry. This awareness resulted in KS KUS first receiving certification to the ISO14001 standard in 2002. The most recent recertification audit occurred in August of 2013. In October of 2006, KS KUS was accepted as a member into the EPA's National Performance Track. The national program, which was terminated in 2009, recognized members that consistently exceed environmental regulation requirements.

The commitment to regulatory compliance and reducing environmental impacts has been at the core of KS KUS' business planning. The Environmental Management System implemented in conformance with ISO 14001 has provided the organizational structure to further drive compliance and improvements.

Environmental improvements driven through the EMS since the inception include:

Coolant - Maximizing the life of coolant used during machining processes. Use of coolant in the machining process is critical to company production as well as an environmental significant aspect. Coolant reduction programs through the EMS have decreased coolant usage and assisted in maintaining sustainable levels. Implemented programs have included recycling, process engineering, and employee training.

Energy - Multiple energy conservation projects to reduce usage at the facility. Project examples include installation of compressor sequencers, air leak prevention and correction, equipment upgrades including induction furnaces, and participation with WPS and Focus on Energy programs.

Recycling - Multi-stream recycling initiatives have been successful. Recycling efforts include socks and pads, on-site chip recycling, steel and other various metals, paper and card board, and beneficial reuse project.

Wastewater - Reduction of wastewater generated and disposed.

Hazardous Materials - Maximizing or reducing use of hazardous materials used at the facility. Identifying avenues for beneficial reuse of spent chemicals.

Employee Awareness - Building employee awareness of environmental issues concerning. Recently, a program to collect and recycle employee household batteries was implemented under the EMS Objectives & Targets.

KS KUS has maintained a history of compliance with all major environmental regulations. Current permits are held under the Clean Air Act (State Operating Permit), WPDES, and local wastewater utility. The facility is also subject to the Oil Pollution Act (SPCC), EPCRA, TSCA, NESHAPs, Hazardous Materials Shipping and European Union requirements.

In 2014, KS KUS continues to maintain the successful EMS program and seek improvements to reduce the impact company activities have on the environment. Challenges continue for the significant aspects at the facility. Not only to find improvements, but to maintain the accomplishments already realized.

KS Kolbenschmidt US, Inc.

Headquarters · 1731 Industrial Parkway · Marinette · WI 54143 · Tel: (715) 732-0181 · Fax: (715) 732-1196
Sales and Engineering · 975 S. Opdyke Road · Ste. 100 · Auburn Hills · MI 48326 · Tel: (248) 836-3000 · Fax: (248) 836-0248

CERTIFICATE

TUV Rheinland of North America, Inc.
1300 Massachusetts Avenue, Boxborough, MA 01719



Hereby certifies that

KS Kolbenschmidt US, Inc.

1731 Industrial Parkway
Marinette, WI 54143
USA

has established and maintains an environmental management system for the

Design, Manufacture and Assembly of Engine Pistons

An audit was performed and documented in Report No 9889.
Proof has been furnished that the requirements according to

ISO 14001: 2004

are fulfilled.

Further clarification regarding the scope of this certificate and the applicability of
ISO 14001: 2004 requirements may be obtained by contacting TRNA.

Certificate Registration No.

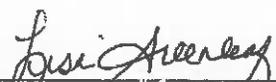
74 300 9889

Certificate Effective Date
September 14, 2013

Certificate Expiration Date
September 13, 2016

Revised 9/20/2013
Certification Decision Date: 8/26/2013




Certification of Management Systems

2014 ISO14001 Environmental Objectives & Targets

| Category | Objective | Target | Responsibility |
|----------|--|---|---|
| 1 | Improve Environmental Performance by obtaining WI DNR Green Tier Status | Submit and obtain acceptance to program in 2014 | Versch/Welty |
| 2 | Implement effective program to reduce Coolant by capturing/recycling coolant from chip hoppers | Assign responsibility, and ownership of draining coolant hoppers 5% improvement in coolant usage per piston by Dec 31, 2014. (Coolant usage chart) | KS Plant Manager, Operations Managers, Facilities Manager |
| 3 | Increase overall employee awareness of environmental efforts. Post recycling accomplishments monthly starting in May 2104. Quarterly Env. Article in newsletter | 10% improvement in audit results- Compare 2nd half of 2014 to first half. Awareness measured by knowledge of EMS efforts during internal audits. (Audit summary Reports) | Bay Environmental/ Welty |
| | | | |
| | | | |
| | | | |

Mark Janner 6/24/14



KOLBENSCHMIDT



Environmental, Health and Safety Policy

KS Kolbenschmidt US, Inc.
is committed to reducing the potential
risk we may have on the environment,
health, and safety of our associates
and community.

This is achieved through safe work
practices, the prevention of pollution,
compliance with relevant laws and
regulations and continual
improvement.