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**Green Tier Commitment Outline for  
Phillips-Medisize – Custom I & II**  
Custom I – 1 Plastics Dr, Phillips WI  
Custom II – 1156 Airport Rd, Phillips WI

Approval Date – August 13, 2009

Commitment Outline Updated: 02/07/2020

The updates since participation started are:

- Change of project coordinator
- Change of company name
- Change of SPOC
- 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 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, **August 13, 2010** 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, **August 13, 2012** 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 **March 31<sup>1</sup>** 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>

<sup>1</sup> Phillips-Medisize submits one report for all of its' facilities. For convenience sake, the annual report due date is considered to be March 31st.

- 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, [Gina.Keenan@Wisconsin.gov](mailto:Gina.Keenan@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: Gina Keenan, Phone 715-836-6574, [Gina.Keenan@Wisconsin.gov](mailto:Gina.Keenan@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



## 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

August 13, 2009

Jason Grendahl, Plant Manager  
Phillips Plastics Corporation - Custom I & II  
939 South Whelen Avenue  
Medford, WI 54451

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Mr. Grendahl:

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 Phillips Plastic Corporation - Custom I and II 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. You have said your EMS will help the facility and its people identify and advance their efforts to improve environmental performance in waste reduction, recycling, energy savings, and emissions reductions within the facility. The Department recognizes that you have fulfilled the requirement of implementing an EMS and congratulate you on your recertification to ISO 14001 on March 11, 2008. 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 may prevent the fulfillment of these commitments, please notify us.

As a part of your commitments, you have agreed to submit to the DNR an annual report regarding your participation in the program. These reports should document your current EMS objectives and targets, as well as discuss any measured progress made toward those goals stated 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 by March 18, 2010 and annually thereafter.

We also ask that you consider addressing the attached list of generic environmental indicators in your annual report. 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 Phillips Plastics' 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 Phillips Plastics Corporation - Custom I & II facilities 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 facility. 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 Phillips Plastics Corporation - Custom I & II as a Green Tier participant on the DNR website.

Finally, Mark Harings has been assigned as your single point of contact. He can be reached at 715-831-3263 or at [Mark.Harings@wisconsin.gov](mailto:Mark.Harings@wisconsin.gov). Please contact Mark 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 in Green Tier and know that we stand ready to work with you on a Tier 2 contract in the future.

Sincerely,

s/ /Matthew Frank

Matthew J. Frank, Secretary  
Wisconsin Department of Natural Resources

Attachment: Tier 1 Application  
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		
Mark Kind	Safety, Health & Environmental Specialist		
Street Address	City	State	ZIP Code
One Plastics Drive	Phillips	WI	54555
Telephone Number	Fax Number	E-mail Address	
(715) 339-2181	(715) 339-5880	mark.kind@phillipsplastics.com	

## II. Facility Information

Facility Name	County		
Phillips Plastics Corporation Custom I and Custom II facilities	Price		
Street Address	City	State	ZIP Code
One Plastics Drive	Phillips	WI	54555
Mailing Address	City	State	ZIP Code
One Plastics Drive	Phillips	WI	54555

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:

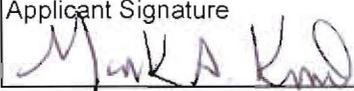
- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

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 3/6/09
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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
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## Attachment I

Phillips Plastics Corporation	Custom I	Custom II
Building Address	One Plastics Drive, Phillips, WI	1156 Airport Road, Phillips, WI
County	Price	Price
Facility Contact	Mark Kind - Safety, Health & Environmental Specialist	Mark Kind - Safety, Health & Environmental Specialist
Business Phone	715-339-2161	715-339-2161
Date of Construction	1966 (start of opeartion 1967)	1999 (start of operation 1999)
SIC /NAICS Codes	3089/326199	3089/326199
DOT Hazardous Materials Certification of Registration	070706001 008OQ	070706001 008OQ
EPA Hazardous Waste Generator Identification Number	WIT560012320	WIR000048421
Storm Water Permit #	N/A	N/A
Non Contact Cooling Water Permit #	N/A	WI-0044938-5
Air Emission Permit #	ROP - A02/RCP-A02	N/A
Well Permit #	N/A	High Capacity Wells #7932 & #7802

## ATTACHMENT II

### **GENERAL INFORMATION:**

Phillips Plastics Corporation opened its first production facility, later to be identified as Custom I, in 1967 in Phillips, WI. This facility has a wide variety of capabilities ranging from small parts molding, insert molding and custom molding, painting, to in mold decorating/labeling and lens molding/decorating. Throughout the years this building has been expanded a multiple times to accommodate the growing business/markets. In 1999, Phillips Plastics expanded its operations into a new state-of-the-art production facility known as Custom II also located in Phillips, WI on neighboring property. The Custom II plant provides services for medium to high volume injection molded components and assemblies. Together, these facilities have over 210,000 square feet of space with more than 87 injection molding machines that range from 7 to 925 tons. The facilities serve medical, defense, automotive and consumer markets.

The Custom facilities dedication to environmental excellence has successfully established our commitment and sustained certification to the ISO 14001 environmental management system standard since 2001. Our EMS efforts originally began by educating all employees regarding environmental stewardship and performance. Using the acronym **FACE** Phillips Plastics aligned the ideas of the corporation to support the efforts of employees by **F**ollowing Laws, **A**voiding Pollution, **C**ontinuous Improvement and having respect for our **E**nvironment. This educational process has generated many different ideas and methods to improve our environmental performance in meeting our goals of environmental protection. Today, we annually refresh our environmental training with all employees and contractors by challenging them to continually generate new ideas.

### **OBJECTIVES/TARGETS:**

The facilities currently have ISO 14001 certification under a corporate certification. Our current corporate objectives center on the following primary topics: (1) Waste Reduction, (2) Energy Reduction, (3) Involvement (4) WI Green Tier Participation. These topics are addressed with the following objectives:

<b>Topic</b>	<b>Objective</b>
Waste Reduction	Minimize pollution impact through proper waste disposal/recycling
Energy Reduction	Reduce energy consumption via energy reduction projects
Involvement	Increase overall awareness of recycling efforts and energy reduction to solicit new ideas
Wisconsin Green Tier	Evaluate and attempt to achieve Green Tier status

**FACILITY SUPPORTING RESULTS:**

The Phillips Plastics Custom facilities are committed to the achievement of their EMS objectives and targets through the implementation of a number of environmental projects aimed at reduction of waste and energy use, involvement of our employees in our environmental activities and achievement of Green Tier status.

***Waste Reduction:***

Phillips Plastics Custom recycling efforts have reduced non-renewable resources of solid waste generation. The people of Phillips Plastics Custom facilities have and will continue to put a lot of effort into collecting, sorting, and recycling. The following table provides a summary of universal/general wastes generated/recycled at the Custom facilities in 2008:

<b>Recycle Stream</b>	<b>Amount in FY08</b>
Paper / Cardboard	<b>200 yds<sup>3</sup></b>
Plastic Production Scrap	<b>355,543 lbs</b>
Metal	<b>90,815 lbs</b>
Aluminum	<b>1,944 lbs</b>
Spent Lamps/Bulbs	<b>236 bulbs</b>
Spent Batteries	<b>16 lbs</b>

Other successes that involve recycling include the proper recycling of electronic equipment (computer and related equipment), the use of recycling copy machine paper, recycling of printer cartridges and cell phones, and more. Past ideas for waste reduction have included implemented projects such as waste compactors, cardboard compactors, recycling centers and other projects. A mixed plastics recycling stream was recently set up at the facilities as a result of recent Green Tier ideas generated by other facilities.

Another example of our commitment to waste reduction was to decrease the overall permitted air emissions for one of our facilities. In 2007/2008, Phillips Plastics Custom I facility took steps to voluntarily revoke its traditional air pollution permit in order to obtain a Type A Registration Operation Permit. This has reduced the Custom I plant's VOC (Volatile Organic Compound) emissions limit from 100 tons/year to 25 tons/year. It has also decreased the allowable HAP (Hazardous Air Pollutant) emissions limit from 25 tons/year to 2.5 tons/year individual (or 6.25 tons aggregate HAP's).

***Energy Reduction:***

In 2008 several energy reduction projects were implemented at Phillips Plastics Custom facilities. These projects include the installation of LED dock lights and EXIT signs, motion sensors to turn lights on & off when not in use, and replacement of metal halide lights and T-12 lights with energy efficient T-8 fluorescent fixtures. These new fixtures provide us much more illumination with substantially less energy consumption. The following tables demonstrate the energy savings that resulted from these projects.

## Custom I Lighting Project – Greenhouse Gas Reduction Table

EPA Web Page (Conversion of kWh to CO2 Reduction) <http://www.epa.gov/cleanenergy/energy-resources/calculator.html>

<b>kWh Reduction</b>	<b>578,446</b>	kWh
<b>CO2 Reduction</b>	<b>415</b>	tons

**Equates to:**

<b>76</b>	Passenger cars not driven for one year
<b>47,153</b>	Gallons of gasoline consumed
<b>966</b>	Barrels of oil consumed
<b>6</b>	Tanker trucks filled with gasoline
<b>10,652</b>	# of tree seedlings grown for 10 years
<b>94</b>	Acres of pine forest storing carbon for one year
<b>3</b>	Acres of forest preserved from deforestation
<b>17,309</b>	Propane cylinders used for home barbeques
<b>2</b>	Railcars of coal burned
<b>143</b>	Tons of waste recycled in lieu of landfilled.

The removal of the various old lighting systems resulted in the recycling of generated wastes. An additional positive note that occurred as a result of the lighting project was the elimination of potential PCB ballasts from the facility (old T-12 lighting fixtures). The following table provides a highlight of the results:

<b>Recycle Stream</b>	<b>Amount</b>
Metal Halide	<b>209 bulbs</b>
Fluorescent	<b>635 bulbs</b>
Potential PCB Ballasts	<b>2,312 lbs</b>

In 2009, the Phillips Plastics Custom facilities will continue to achieve superior performance through our continuous improvement processes. The company has allocated resources to the following energy reduction projects that will result in 418,919 kW of energy savings (equates to 302 tons of CO2 reduction) as a commitment to this effort.

<b>Facility</b>	<b>Project</b>	<b>Potential kW Savings</b>
<b>Custom I</b>	Installation of a flow control valve, a 1,040 gallon of compressed air receiver vessel capacity and dedicating piping from the compressor to regulate the flow of the plant.	<b>119,279</b>
<b>Custom II</b>	Installation of 2,480 gallons of compressed air receiver vessel capacity and a primary flow control valve to regulate the flow of the plant and a 100 hp compressor.	<b>219,113</b>

<b>Custom II</b>	Installation of motion sensors in the basements of the facility.	<b>42,158</b>
	Change of 66+ 100w exterior flood lights with energy efficient PAR lights.	<b>24,572</b>
	Installation of a new type of battery charging station for our electric forklifts that uses high frequency and minimizes charging time from 8 hours to 2 hours, thus, considerably reducing electricity use.	<b>13,797</b>

***Involvement:***

At Phillips Plastics Custom facilities, we encourage our employees to generate new ideas to continuously improve our environmental performance. We also annually refresh our environmental training with all employees and contractors.

Furthermore, we educate our employees on how to be environmentally friendly not only at work but in their personal homes. Examples of such efforts include the postings with interesting environmental facts that we put up throughout the facilities as well as our Energy Education Centers that were set up at the Custom facilities with the help from the WI Focus on Energy program.

In cooperation with Wisconsin Focus on Energy, we have established Energy Education Centers throughout the Phillips Plastics Custom facilities to provide our employees with information on numerous energy efficiency and renewable energy tips and ideas for their homes. Many employees have great ideas to improve environmental performance and through this extended outreach, several environmental improvement ideas have been generated. This was done in conjunction with our various facility energy improvement projects to help foster energy improvement concepts both on and off the job.

Environmental planning is part of our day-to-day business operations. Our EMS system includes an environmental review for all new projects that come into our facility and even for each new part that we will manufacture. This ensures that a regulatory review has been conducted to ensure proper handling of any hazardous waste, air, or water emissions that could be generated. A solvent recovery still project was proposed as a result of this involvement.

This solvent recovery still system will help the facility to recycle and reuse solvents from its painting processes. This equipment was recently purchased and has already arrived at the Custom I plant and will be installed in 2009. We will be able to minimize hazardous waste disposal and will have the generator status changed from a large quantity generator to a small quantity generator of hazardous waste or potentially even conditionally exempt.

We will also continue to annually audit our EMS system to ensure that we are moving forward in the right direction. We will continue to challenge our employees to provide their

input and work with them to implement their ideas. Attachment III provides further detailed descriptions of these topics.

Other efforts to expand the emphasis on environmental stewardship of our employees include our annual tree/shrub giveaway in recognition of the Earth Day. To date the Custom facilities have provided over 1,586 trees and shrubs to our employees to help “green” our world.

<b>Year</b>	<b># of Plantings</b>
2006	<b>482</b>
2007	<b>598</b>
2008	<b>506</b>

***Wisconsin Green Tier:***

We are in the process of preparing an application into the Green Tier program for our Phillips Plastics Custom I & II facilities. Achievement of Green Tier status will be an important accomplishment for the Custom facilities and will publicly recognize our dedication to exceptional environmental performance. We have been educating our employees about the benefits of the program for the facilities and the significance of this achievement to the Phillips Plastics Custom plants.

**SYNOPSIS:**

Our focus will continue to reduce the overall environmental footprint and maintain compliance with various environmental standards. In closing, Phillips Plastics Custom I & II facilities recognize that we could not do all that we do for the environment without our environmental partners. These individuals and organizations are listed in Attachment IV. Support of our partnership is enclosed.

For additional detail, please contact Mark Kind at 715-339-2161. Thank you for consideration of Phillips Plastics Custom I & II facilities to achieve WI Green Tier, Tier I Participant status.

## ATTACHMENT III

### EMS Objectives and Targets

Topic	Objective
Waste Reduction	Minimize pollution impact through proper waste disposal/recycling
Energy Reduction	Reduce energy consumption via energy reduction projects
Involvement	Increase overall awareness of recycling efforts and energy reduction to solicit new ideas
Wisconsin Green Tier	Evaluate and attempt to achieve Green Tier status

In addition to these EMS objectives, we perform many different regulatory activities to comply with all applicable WI DNR, EPA, and city regulations.

### WASTE REDUCTION

#	Idea/Program	Results
1.	Improve recycling sorting by color coding recycling bins	By implementing this system we reduced plastic materials being sent to a land fill due to production people not knowing what containers to properly place the materials in. This has also increased revenue from plastic being sent out for recycling.
2.	Implement recycling bins for mixed plastic purging and plastic bags	Setting up these recycling bins reduced the waste going to landfill and allowed the facility to become a plastics user that sends a minimal amount of plastic to the landfill.
3.	Implement recycling bins for bag/film material	Setting up these recycling bins will reduce waste to landfill and allow the facility.
4.	Evaluate / audit recycling and waste handlers	Will allow and ensure our waste streams are being properly managed.
5.	3 <sup>rd</sup> Party evaluations	Contact vendors such as Maine Plastics and other recyclers to have them audit each building waste streams again to determine additional components for recycling.
6.	Purchase a hazardous waste compactor for solvent and paint contaminated rags	A compactor for solvent and paint contaminated rags was purchased and installed at Custom I facility. By compacting contaminated rags we are able to dispose of fewer drums with rags and reduce our waste disposal costs.
7.	Install a solvent still	Solvent still will help Custom I to recycle and reuse the solvents from its painting processes. This will minimize the plant's hazardous waste disposal and will allow it to change its hazardous waste generator status from a large quantity generator to a small quantity generator (or conditionally exempt generator of hazardous waste).

## ATTACHMENT III continued

### ENERGY REDUCTION\*

#	Idea/Program	Results
1.	Replace all Metal Halide lights and T-12 lights with all T-8 lights	Completed in October 2008. This project updated most of the interior lighting at Custom I facility. It resulted in considerable energy reduction and significant lighting improvements.
2.	Install motion sensors	Installation of motion sensors in the areas that are not used at all times, specifically in the basement, tunnels, storage areas, records area, etc. will help us reduce our energy use.
3.	Conduct compressed air efficiency study	John Henry Foster was contracted to perform a comprehensive compressed air evaluation of Custom facilities. The study was completed in October 2008. The resulting recommendations will be implemented in 2009 and will improve existing compressed air systems and lead to substantial energy savings.
4.	Air leak audit	Compressed air leak audit was completed in August of 2008 with leaks identified and tagged to be fixed. A follow-up air leak audit will be completed in March to identify any leaks that could result from recent equipment movement. As leaks are being fixed, consumption of compressed air and electricity is reduced, which in turn leads to substantial cost savings.
5.	Compressed air related projects	Installation of a pressure flow control valve, compressed air receiver vessel capacity and dedicating piping from the compressor to regulate the flow at Custom I facility and reduce energy use.
6.	Compressed air related projects	Installation of flow control, storage tanks and a compressor will help regulate flow at Custom II facility and improve energy efficiency.
7.	Exterior lighting	Replacement of 66+ 100w exterior flood lights with energy efficient PAR lights will lead to energy savings.
8.	Battery charging station	Installation of a new type of battery charging station for our electric forklifts that uses high frequency will help us decrease charging time from 8 hours to 2 hours, thus, considerably reducing electricity use.

\*A number of other energy savings projects are being reviewed and are funding dependent.

## ATTACHMENT III continued

### INVOLVEMENT

#	Idea/Program	Results
1.	Training	Perform training on our environmental expectations at new employee orientation and again, each year during required refresher training.
2.	Universal Waste Training	Maintenance employees are provided additional training on practices for the recycling of waste oil, parts washer solvents, fluorescent bulbs, batteries, and other universal wastes.
3.	Hazardous Waste Training	All employees that generate, prepare for shipment, or transport hazardous waste within our facility receive specialized training specific to hazardous waste they are handling.
4.	Employee Tours	New employees are provided a tour during orientation showing them the locations available for recycling lunchroom, production, and shipping recyclables.
5.	Share recycling information on lunchroom TV's	Display a power point presentation on our lunchroom TV showing our production scrap work its way through the recycling process at Maine Plastics.
6.	Posting about recycling	Postings are used throughout the year to communicate interesting facts about recycling in our efforts that our people will use the information both at work and at home.
7.	Educating our people regarding energy tactics	Put up postings regarding the lighting project to discuss energy savings, equivalents in trees planted, cars off the road, etc. to make our environmental activities more "real" to our people.
8.	Educate employees on home energy savings ideas	We arranged for WI Focus in Energy Home Performance to attend our fall Safety and Health fairs. WI Focus in Energy Home Performance provided us with information regarding home energy audits, energy reduction ideas for employees to use at home, and granted a free home energy audit,...etc.
9.	Set up Environmental Education Centers at each facility	Working with WI Focus on Energy Home Performance group we set up "Environmental Education Centers" for our employees in each of Custom facilities. The education centers contain pamphlets on home energy projects and training materials that show employees how to save energy at home and complete projects such as installing insulation, sealing windows, etc. Also distributed pamphlets for each employee from Xcel Energy titled "60 Easy Ways to Reduce Your Next Energy Bill".
10.	Partner with County recycling Assistant on recycling programs	Receive heads up on different types of "clean sweeps" (hazardous waste, drug/medication round ups, etc.) through the year and share that information with our employees via postings.

## ATTACHMENT III continued

### WISCONSIN GREEN TIER

#	Idea/Program	Results
1.	Complete Green Tier application	The Green Tier application with the supporting materials will be completed and submitted to WDNR.
2.	Achieve Green Tier status	Achieving Green Tier status will result in a number of benefits (e.g. one point of contact with WDNR) and public recognition of Phillips Plastics Custom facilities dedication to environmental protection.
3.	Educated employees about Green Tier	Information posters will be put up throughout the facilities to educate our employees about the significance of achieving the Green Tier status and the benefits of the program.
4.	Foster Green Tier partnerships with other Green Tier companies and community stakeholder involvement	Achievement of Green Tier status will allow the Phillips Plastics Custom facilities to foster partnerships with those companies that share the Phillips Plastics commitment to exceptional environmental performance. It will also lead to community stakeholder involvement.
5.	Conduct annual EMS audit of Custom facilities and provide audit reports to WDNR.	Every year an environmental management system audit will be conducted at the Custom facilities. The results of the audit as well as the progress toward the achievement of the EMS objectives and targets will be provided to WDNR.