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**Green Tier Commitment Outline for
Phillips-Medisize – Medford**
939 S Whelen Ave, Medford WI

Approval Date – April 1, 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/CO503.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, **April 1, 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, **April 1, 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 31¹** and annually thereafter. (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>

¹ 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 and to your Single Point of Contact, Gina.Keenan@Wisconsin.gov.

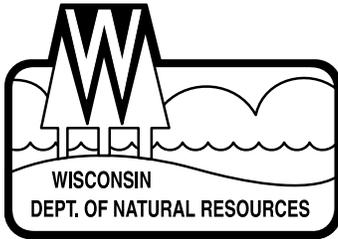
III. Work toward Superior Environmental Performance

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
- 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

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

April 1, 2009

Jason Grendahl, Plant Manager
Phillips Plastics Corporation Precision Decorating
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 Precision Decorating's (939 Whelen Avenue, Medford, Wisconsin) 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 Precision Decoration facility 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 Precision Decorating 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. 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



Green Tier Application

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 Record's 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
939 South Whelen Ave.	Medford	WI	54451
Telephone Number	Fax Number	E-mail Address	
(715) 748-8961	(715) 748-8990	mark.kind@phillipsplastics.com	

II. Facility Information			
Facility Name	County		
Phillips Plastics - Precision Decorating Facility	Taylor		
Street Address	City	State	ZIP Code
939 South Whelen Ave.	Medford	WI	54451
Mailing Address	City	State	ZIP Code
939 South Whelen Ave.	Medford	WI	54451

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:

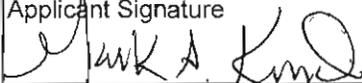
- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

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 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 	Date Signed September 19, 2008
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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

ATTACHMENT I

Phillips Plastics Corporation - Precision Decorating Facility	
Building Address	939 South Whelen Avenue
County	Taylor
Facility Contact	Mark Kind - Safety, Health & Environmental Specialist
Business Phone	715-748-8961
Date of Construction	1975 (Start of Operation 1975)
SIC /NAICS Codes	3089/326199
DOT Hazardous Materials Certification of Registration	070706 001 0080Q
EPA Hazardous Waste Generator Identification Number	WID068318146
Storm Water Permit #	NA
Non Contact Cooling Water Permit #	NA
Air Emission Permit #	861009270-F03
Well Permit #	NA

ATTACHMENT II

The Phillips Plastics Precision Decorating facility opened in 1973 and is located in Medford, WI in its Industrial Park #1. Precision Decorating is a unique facility within the Phillips Plastics Corporation in that not only does it mold plastics parts and assemble parts, it has the capabilities to decorate plastic parts through laser etching and painting processes. With the laser etching process we are able to etch graphics onto painted plastic parts which allows light to transit through the part, much like the buttons on your automobile are able to at night when the dash lights are on. The painting process allow us to be able to laser etch the parts and paint parts to specific colors/glosses that customers request for complex plastic components. With these capabilities, we work with numerous markets in the manufacturing of plastic parts/components.

Precision Decoratings dedication to environmental excellence has successfully established our commitment and sustained certification to the ISO 14001 environmental management system standards since 2001. Our efforts began by educating all employees. Using the acronym "FACE"; Phillips Plastics aligned the idea of the corporation to support the efforts of employees by, Following Laws, Avoiding Pollution, Continuous Improvement and to have respect for our Environment. This education process has generated many different ideas and methods to improve our environmental performance in meeting our goals of environmental protection.

The paint process at Precision Decorating has been for years the biggest environmental challenge in that we had run under a minor source air pollution control operation permit for several years. By running under this permit we were always limited as to what paints we could use and were continually monitoring the amount of VOC's that were being omitted to ensure that we did not exceed our air permit requirements. In December 2000 Precision Decorating worked with the DNR and Anguil Environmental in developing and installing an RTO (Regenerative Thermal Oxidizer) unit that would convert the VOC's to carbon dioxide and water vapor through a high temperature process. In the fall of 2000 the RTO was installed and a new air permit was applied for that allowed us to change from a minor source of less than 100 tons per year of VOC emissions to a major source with the potential to emit over 225 tons. This system after installation and testing also measured 99% destruction rate efficiency for VOC emissions at 100 % capture which from an environmental point is excellent in reducing the amount of air pollution released to the air. In the first 6 months of operation it resulted in a net reduction of 58 tons of VOC emissions. Implementing this RTO and changing air permits also has allowed us to offer our customers a large variety of paint colors and finishes to meet our customer demands and keep us competitive with the global market.

In August 20, 2007 Precision Decorating installed a 50 gallon Little Still manufactured by Finish Thompson, Inc. to reclaim the high volume of solvents used in the painting process that were being shipped out as hazardous waste on a regular bases . The amount of hazardous waste shipped out on a monthly bases averaged 1,462 gallons based on production demands. To date, we have shipped out 0 gallons of solvent waste vs. 11,850 gallons as compared to the prior year.

By installing the Little Still we are able to reclaim an average of 1650 gallons of solvent a month and use it back in the painting process with not having to ship it out as hazardous waste. The implementation of the still resulted in a hazardous waste transporting company coming in every two weeks vs every week and resulted in a savings of \$8,964 a month. With projects such as the installation of the RTO and Little Still, Precision Decorating continually works on a regular basis to try and find alternative methods to make environmental improvements.

Today, we annually refresh our environmental training with all employees and contactors by challenging them to continually generate new ideas. Our current focus, objectives and targets, center on the following: (1) Increased Employee Awareness, (2) Reduction of Land Filled waste and Increased Recycling; and (3) Reduced Energy Consumption. Other efforts to expand the knowledge base of our employees included our annual tree/shrub giveaway in recognition of Earth Day. To date, Precision Decorating has provided over 2,272 trees and shrubs to our employees to help “green” our world.

Year	# of Plantings
2004	454
2005	454
2006	396
2007	504
2008	464

To expand our energy reduction efforts beyond our doors, Precision Decorating helped sponsor a “Change-12” light program. This program offered up to 12 compact florescent light bulbs for our employee’s homes. 1,517 light bulbs were sold through the facility in 2007 and the financial proceeds were donated to The Children’s Miracle Network. Other home energy ideas; such as free home energy audits were given away in a prize drawing to our employees at our Safety, Health, and Environmental Fair in partnership with Focus on Energy Home Performance Program. More ideas are in the works for this facility to help our people generate energy savings ideas for both on and off the job.

Recycling efforts have reduced non-renewable resources of solid waste generation. The people of Precision Decorating put a lot of effort into collecting, sorting, and recycling the following:

Recycle Stream	Amount in FY07
Paper / Cardboard	174 cu yds
Plastic Production Scrap	233,415 lbs
Metal	27,851 lbs
Spent Lamps/Bulbs	551 bulbs
Oil	300 gallons
Spent Batteries	67.2 lbs

Other successes that involve recycling include the proper recycling of electronic (computer and related equipment), the use of recycling copy machine paper, wood pallets, and recycling of printer cartridges and cell phones, Styrofoam peanuts, and more.

In cooperation with Wisconsin Focus on Energy Phillips Plastics Precision Decorating facility has implemented several energy reduction projects. These include the installation of LED exit lights, 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. A summary of all the completed projects and / energy saving of those projects is listed below.

Precision Decorating Lighting Project – Greenhouse Gas Reduction Table

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

kWh Reduction	411,707	kWh
CO2 Reduction	320	Tons

U.S Climate Technology Cooperation Gateway (Conversion of CO2 reduction to realistic measures) <http://www.usctcgateway.net/tool/>

Equates to:

59	Passenger cars not driven for one year
36,322	Gallons of gasoline consumed
744	Barrels of oil consumed
4	Tanker trucks filled with gasoline
8,205	# of tree seedlings grown for 10 years
73	Acres of pine forest storing carbon for one year
2	Acres of forest preserved from deforestation
13,333	Propane cylinders used for home barbeques
2	Railcars of coal burned
110	Tons of waste recycled in lieu of landfilled.

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.

Going forward, Precision Decorating will continue to achieve superior performance through our continuous improvement processes. Phillips Plastics’ focus will remain on reducing Precisions Decoratings’ environmental footprint and on maintaining complete compliance with the environmental standards that we are held to. We will 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.

In closing, Phillips Plastics Precision Decorating recognizes 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 715-748-8961. Thank you for consideration of Phillips Plastics Precision Decorating facility in receiving the WI Green Tier, Tier I Certification.

Environmental Policy

ATTACHMENT III

PHILLIPS PLASTICS CORPORATION™

Phillips Plastics Corporation is a world class injection molder with state-of-the-art secondary decorative capabilities.

We are committed to continued excellence, leadership, and stewardship in protecting the environment. Our objective as a Corporation is to achieve minimal adverse impact on the environment through excellence in environmental control using a continual improvement approach in waste reduction and pollution prevention.

Environmental protection is a top management commitment as well as the responsibility of every person within the organization.

Environmental management system practices are designed to ensure compliance with relevant environmental legislation and regulations, as well as other standards to which the Corporation subscribes related to our environmental aspects.

A multifunctional task team, using the process flow method, identifies environmental aspects and impacts. These aspects and impacts are considered in setting measurable environmental targets and objectives, which are periodically reviewed by the appropriate level of management.

We are committed to communicating our policy to all Phillips Plastics people, as well as other interested parties.



Bob Cervenka,
Founder, Chairman of the Board,
and Chief Executive Office,
Phillips Plastics Corporation

Phillips
PHILLIPS PLASTICS CORPORATION™

Certificate of Registration

ENVIRONMENTAL MANAGEMENT SYSTEM - ISO 14001:2004

This is to certify that:

**Phillips Plastics Corporation
3449 Sky Park Boulevard
Eau Claire
Wisconsin
54701
USA**

Holds Certificate No: EMS 93521

and operates an Environmental Management System which complies with the requirements of ISO 14001:2004 for the following scope:

Design, Manufacture, Decoration and Assembly of Injection Molded Plastic and Metal Components.

This certificate is traceable to this company's original registration certificate number CERT-03846-2002-AE-HOU-RAB dated February 20, 2005 and issued by DNV registrar.

For and on behalf of BSI:



President, BSI Management Systems America, Inc.

Originally Registered: 03/12/2005

Latest Issue: 03/11/2008

Expiry Date: 03/10/2011



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**Management
Systems**

This certificate remains the property of BSI and shall be returned immediately upon request.
An electronic certificate can be authenticated online. Printed copies can be validated at www.bsigroup.com/ClientDirectory
To be read in conjunction with the scope above or the attached appendix.
Americas Headquarters: 12110 Sunset Hills Road, Suite 200, Reston, VA 20190, USA.