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**Green Tier Commitment Outline for
Phillips-Medisize – Metal Injection Molding (MIM)**
422 Technology Dr E, Menomonie WI

Approval Date – August 14, 2008

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, **August 14, 2009** 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 14, 2011** 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

August 14, 2008

Skip Swanson - Plant Manager
Phillips Plastics Corporation, Metal Injection Molding
422 Technology Drive E
Menomonie, WI 54751

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Mr. Swanson:

Congratulations! Following a 30 day public comment period, the Wisconsin Department of Natural Resources (DNR) has approved your application as a participant in Green Tier. This letter of acceptance covers the Metal Injection Molding facility located at 422 Technology Drive, Menomonie, Wisconsin, and the activities outlined by your application. This letter is issued in accordance with the Environmental Results Program Act as authorized by Wisconsin Statute section 299.83, effective May 1, 2004, when 2003 Wisconsin Act 276, commonly referred to as the "Green Tier Law", was signed into law.

This letter of acceptance recognizes your previous achievements in environmental management and your future projects and goals as described in your application (see attached). Your participation in the Green Tier program reflects your commitment to improving Wisconsin's environment through superior environmental performance. This letter serves as an acceptance of the commitments your facility agreed to in your application. Should circumstances arise that may prevent the fulfillment of these commitments, please notify us.

By entering the Green Tier Program, you have agreed to develop and pursue goals to improve your environmental performance beyond compliance while utilizing an Environmental Management System (EMS). The Department recognizes that you have fulfilled the requirement of implementing an EMS and that the system is currently registered to the ISO 14001 standards. 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.

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 provide an update of your current objectives and targets, as well as discuss any measured progress made toward those objectives and targets stated in your EMS or on your application. You should also present the results of your annual EMS audit, describing any non-conformances discovered by it and identifying actions taken or proposed to correct them. Your first report should be submitted no later than March 18, 2009 or another date that may be arranged with the Department.

We also ask that you consider addressing the attached list of generic environmental indicators in your annual report, especially those related to the objectives and targets established in your application for the Metal Injection Molding facility. This additional reporting is completely 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 successes of the Green Tier program.

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 consider collaborating with the department to develop such a group. We also ask that you describe this or any other communications with concerned entities in your annual report.

In recognition of Phillips Plastics' diligent environmental stewardship 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 either a non-conformance with your EMS or a violation of an existing environmental requirement, provide us notice of your discovery along with a corrective action plan that conforms to the requirements in the statute. DNR will not seek to impose penalties on Phillips Plastics Metal Injection Molding facility for the non-conformance or violation provided the facility successfully implements 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.

In addition, this letter authorizes your use of the Green Tier logo on written materials related to your facility. Please see the attached guidelines for further information regarding the use of the logo. Furthermore, you will receive a certificate that recognizes Phillips Plastics' Metal Injection Molding, participation in Green Tier. The department has committed to annually celebrating your participation in the program through a press release, and will publicize Phillips Plastics Metal Injection Molding 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/ Matt Frank

Matthew J. Frank, Secretary
Wisconsin Department of Natural Resources

Attachment: Tier 1 Application
Certificate of Recognition
Environmental Results Program Logo
Functional Equivalency Guidance
Generic Suite of Environmental Indicators

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		
Jeri Aasen	Safety, Health and Environmental Specialist		
Street Address	City	State	ZIP Code
422 Technology Drive E	Menomonie WI 54751	WI	
Telephone Number	Fax Number	E-mail Address	
(715) 232-4669		jeri.aasen@phillipsplastics.com	

II. Facility Information

Facility Name	County		
Phillips Plastics, Metal Injection Molding	Dunn		
Street Address	City	State	ZIP Code
422 Technology Drive E	Menomonie WI 54751	WI	
Mailing Address	City	State	ZIP Code

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:

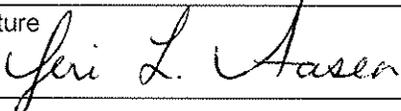
- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

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 05.27.08
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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 – Metal Injection Molding, Menomonie Wisconsin

Building Address	422 Technology Drive East
County	Dunn
Facility Contact	Jeri Aasen, Senior Safety, Health & Environmental Specialist
Date of Construction	1998
SIC Code	3499
NAICS Code	332117
DOT Hazardous Materials Certification of Registration	063003002005LN
EPA Hazardous Waste Generator Identification Number	WIR-000035253
NPDES Storm Water Permit (No Exposure Certification)	WI-S049158-2
WI DNR Registration Operation Permit	ROP – A02 & RCP – A02

ATTACHMENT II

Phillips Metal Injection Molding injection molds a material that is a combination of plastic impregnated with metal particles. The molded components are then sent into a debind process in which the parts are heated and a catalyst is introduced. The catalyst causes the long chain hydrocarbons in the plastics to unzip uniformly removing approximately 90% of the plastic from the parts. The parts are then sent through a sintering process in which they are heated to very high temperatures, removing the remainder of the plastic and causing the metals to come together on a molecular level. The result? High precision stainless steel components!

The Metal Injection Molding facility is located on our 32 acre Menomonie Campus. Phillips Metal Injection Molding's 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 ideas 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 debind portion of our manufacturing process produces formaldehyde gas, one molecule for every hydrocarbon that is unzipped from their long chains. Formaldehyde is a hazardous air pollutant. The Metal Injection Molding worked with the WI DNR to obtain an air operating permit. They have operated under an air permit since the beginning of operations at this facility in 1998. Recently we were able to change our air operating permit type to a Registration Operating Permit (ROP). The flexibility in the ROP that we were granted comes with the responsibility to continue to do the right thing. It is with pride that we maintain our air emission control technologies to reduce our emissions of formaldehyde by 99%.

Today, we annually refresh our environmental training with all employees and contractors 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 include our annual tree/shrub giveaway in recognition of Earth Day. To date, Phillips Metal Injection Molding has provided over 242 trees and shrubs to our employees to help "green" our world. To expand our energy reduction efforts beyond our doors, Phillips Medical helped sponsor a "Change – 12" light program. This program offered up to 12 compact florescent light bulbs for our employee's homes. 150 light bulbs were sold through the facility in 2007 and the proceeds were donated to a local chapter of the American Diabetes Association. Other home energy ideas; such as free home energy audits were given away in a prize drawing to employees at our Safety, Health, and Environmental Fair in partnership with WI 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 & off the job.

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

Recycle Stream:	Amount in FY07
Paper and Cardboard	8.4 cubic yards
Lunchroom Co-mingled recycling of glass, aluminum and tin cans, and plastic containers	96.5 cubic yards
Production Scrap – segregated into grades of stainless	14,432 pounds
Oil and Antifreeze	55 gallons
Fluorescent Bulbs	121 bulbs
Metal Halide Bulbs (all were phased out in 2007)	35 bulbs

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

In cooperation with Wisconsin Focus on Energy Phillips Metal Injection Molding 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 the replacement of metal halide lights with energy efficient fluorescent fixtures. These new fixtures provide us much more illumination with substantially less energy consumption. A summary of all completed projects and /energy savings of those projects is listed below.

Energy Reduction Projects

Plant Area	Type of Project	Project Description			Maintenance Savings	Rebates Applied \$	Project Costs
			kWh	\$\$\$			
Vending Area	Vending	Install Energy Star Machines with Controls (1,700 kw/year per machine)	1,700	\$103.70	NA	NA	\$0.00
All Interior Plant Area	Lighting	Replace metal halides with fluorescent fixtures.	243,990	\$14,883.00	\$4,060.00	6904.5	\$23,106.00

MIM 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	243,990	kWh
CO ₂ Reduction	190	Tons

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

Equates To:

37	Passenger cars not driven for one year
19,632	Gallons of gasoline
401	Barrels of oil
2.31	Tanker trucks filled with gasoline
22	# of Household electrical usage for one year
4420	# of tree seedlings grown for 10 years
144	Acres of pine forest storing carbon for one year
1.41	Acres of forest preserved from deforestation
7182	Propane cylinders used for home barbeques
0.88	Railcars of coal burned
58	Tons of waste recycled instead of landfilled

Environmental planning is a part of our business operations. Our EMS system includes an environmental review for all new projects that come into our facilities 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. An environmental review is also done with each new piece of equipment that is installed. All information from these reviews is documented in our quarterly review meetings and discussed twice a year at our management review meetings.

Going forward, the Phillips Metal Injection Molding organization will continue to achieve superior performance through our continuous improvement processes. Phillips Plastics' focus will remain on reducing Metal Injection Moldings' environmental footprint and on maintaining complete compliance with the environmental standards that they 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. Attachment III helps to describe further detailed descriptions of these topics.

In closing, Phillips Metal Injection Molding 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 Jeri Aasen at 715.232.4669.

Thank you for consideration of Phillips Metal Injection Molding 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**

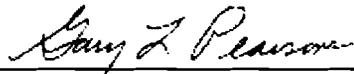
Holds Certificate No: EMS 93521

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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**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.**

**Management
Systems**