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**Green Tier Commitment Outline for
Phillips-Medisize – New Richmond**
705 Wisconsin Dr – New Richmond WI

Approval Date – April 21, 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, **April 21, 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, **April 21, 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

April 21, 2008

John Johnson – Plant Manager
Phillips Medical – New Richmond
705 Wisconsin Dr.
New Richmond, WI 54017

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Mr. Johnson:

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 Phillips Medical – New Richmond facility, located in New Richmond, 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. As we discussed your first report will be submitted no later than March 15 of each year.

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 New Richmond 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 Medical – New Richmond 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 Medical – New Richmond participation in Green Tier. The department has committed to annually celebrating your participation in the program through a press release, and will publicize Phillips Medical – New Richmond 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 encourage you to work toward Tier 2 status in the future.

Sincerely,

/s/ Matthew Frank

Matthew J. Frank, Secretary
Wisconsin Department of Natural Resources

Attachments: Tier 1 Application
Certificate of Recognition
Environmental Results Program Logo
Functional Equivalency Guidance
Generic Suite of Green Tier 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		
Gary Arnevik	Safety Health & Environmental Specialist		
Street Address	City	State	ZIP Code
705 Wisconsin Drive	New Richmond	WI	54017
Telephone Number	Fax Number	E-mail Address	
(715) 246-8738	715-246-8791	Gary.Arnevik@PhillipsPlastics.com	

II. Facility Information

Facility Name	County		
Phillips Plastics Corp. Short Run Solutions	St. Croix		
Street Address	City	State	ZIP Code
705 Wisconsin Drive	New Richmond	WI	54017
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:

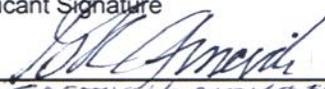
- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

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  SAFETY HEALTH & ENVIRONMENTAL SPECIALIST	Date Signed 11/12/07
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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 Short Run Solutions,

705 Wisconsin Drive New Richmond, St. Croix County, Wisconsin, 54017.

EPA/Wisconsin ID number WID988571139

Facility ID Number FID -656052430

Company Information			
Company Name	Short Run Solutions	Facility Contact	Gary Arnevik
Mailing Address	705 Wisconsin Drive New Richmond, WI	Physical Address	Same
		County	St. Croix
Date of Construction	1989	Business Phone	715/246-8700
Start of Operation	1990	SIC or NAICS	3089 / 326199
Previous use of this facility prior PPC occupancy	None (Empty Field)	DOT Hazardous Material Certification of Registration	063003002005LN
Storm Water Permit #	WI-S9158-2	EPA Hazardous Waste Generator ID #	WID988571139
Air Emission Permit #	NA	Non-Contact Cooling Water Permit #	WI-0044938-5
Well Permit #	85616 & 85617		

ATTACHMENT II

Past events have successfully established our commitment and sustained certification for ISO 14001 environmental management system. Our efforts began by educating all employees. Using the acronym “**FACE**”; this help align the ideas of a corporation to support the efforts of employees by, **F**ollowing laws, **A**voiding pollution, **C**ontinually improve and to have **R**espect for our environmental. This education process has identified many ways and means which has sustained our progress and certification for our ISO14001 commitment at PPC Short Run Solutions facility.

Our efforts have reduced non-renewable resources of solid waste through measurable processes of recycling. We continue to reduce the generation of waste streams at the facilities and we remain actively involved in the reduction of our dependence for energy required to operate this facility.

Other successes that achieve measured reductions of responsible environmental stewardship and continuous improvements are our initiatives to monitor plastic resin recycling, eliminate paper hand towels in the restrooms, proper recycling of electronic wastes (computers and related equipment) use of recycled copy machine paper, and the recycling of printer cartridges and batteries. We recycle all oils, anti-freeze, spent lamps, cardboard and other forms of universal wastes. Phillips Plastics Short Run has continued an annual practice which encourages our employees to plant tree & shrub seedlings. To date, Phillips Plastics Short Run has provided over 700 trees and shrubs to our employees. In an effort to expand attention towards energy savings projects in the home, Phillips Plastics Short Run helped sponsor a “Change – 12” light program. This program offered up to 12 compact florescent light bulbs for our employee’s homes. 999 light bulbs were sold through the facility in 2007 and the proceeds were donated to a local chapter of the American Cancer Society. Other home energy ideas; such as free home energy audits were offered to employees and other ideas are in the works for this facility to help our people generate energy savings ideas for both on & off the job.

In cooperation with Wisconsin Public Power Inc. initiative the Short Run facilities has implemented or is in the process of implementing several energy reduction projects. These include the installation of LED lights, motion sensors to turn lights on & off when not in use, and the replacement of metal halide lights with energy efficient florescent fixtures. These new fixtures will provide us much more illumination with substantially less energy consumption. The production plant floor and the warehouse areas will be completed by November 30th 2007 and will save over 250,000 kW/year in energy usage. The balance of the building lights will be upgraded in a second phase project scheduled to be completed by February 2008.

Going forward, the PPC Short Run Facility will continue to achieve superior performance through continuous improvement processes that will focus our efforts of measurements of reduction of waste generation, reductions of energy use, continued exploration of new recycling options and implementing best practices for the betterment of our relationship with the environment, our employees, community, and customers.

During our most recent aspects and impacts review, several objectives were identified. For the purposes of the Green Tier program – Tier I, PPC Short Run Solutions is submitting the following information as the base line measurable targets and objectives. Attachment III helps to describe further detailed descriptions of these topics.

For additional detail, please contact Gary Arnevik at (715)-246-8738



CERTIFICATE OF REGISTRATION

Environmental Management System

Phillips Plastics Corporation
Short Run
705 Wisconsin Drive
New Richmond
Wisconsin
USA
54017

Operate an Environmental Management System, which complies with the requirements of

BS EN ISO 14001:2004

for the activities detailed in the scope of registration.

EMS 93521

Gary Z Pearson
President

Originally Registered: 12 Mar 2005

Expiry Date: 11 Mar 2008



This is a Presentation Certificate only. This is not a legal document, and cannot be used as such. Only the legal certificate should be used for confirming certificate validity and scope of registration. For further information please contact the certificate holder or BSI, Inc. on 703 437 9000 or www.bsiamericas.com.

Group Headquarters: 389 Chiswick High Road, London W4 4AL, UK.

Americas Headquarters: BSI, Inc. 12110 Sunset Hills Road, Suite 200, Reston, VA 20190, USA.



Management Systems