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Green Tier Commitment Outline for Perlick Corporation

Approval Date – December 15, 2009

Commitment Outline Updated: 02/06/2020

The updates since participation started are:

- Functionally Equivalent EMS is used
- Changed project coordinator
- 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 agreed to implement your EMS on or before **December 15, 2010**. Within 30 days please email your EMS implementation date to: GreenTier@Wisconsin.gov and your Single Point of Contact (SPOC), Mike.Griffin@Wisconsin.gov.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **December 15, 2010** and every year after that, perform an environmental management system audit. The department recommends that your first audit 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>
- B. On or before, **December 15, 2012** and every third year, this audit **must** be completed by a DNR-approved outside EMS auditor.

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 15, 2011** 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>
- D. Please provide annual Green Tier Reports to both of these email addresses: GreenTier@Wisconsin.gov and to your Single Point of Contact, Mike.Griffin@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: Mike Griffin - DNR, Phone 414-263-8554, Cell 414-750-0737, Mike.Griffin@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:** When 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

December 15, 2009

Douglas Graf
Perlick Corporation
8300 Good Hope Rd
Milwaukee, WI 53223

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Mr. Graf:

Congratulations! The Wisconsin Department of Natural Resources (DNR) is pleased to approve your application and welcome Perlick Corporation into the Green Tier Program. This letter of acceptance recognizes the value of Perlick's environmental initiatives and your 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.

This letter recognizes that Perlick has committed to superior environmental performance in how you run your facility. Your application describes a substantial list of environmental accomplishments, including the elimination of your paint booth, a degreaser, and your copper plating system. Perlick has acted aggressively on several fronts to reduce your environmental footprint. If future circumstances impede your sustained commitment to these practices, please notify us.

In addition to your broader efforts described above, you have also agreed to implement the following measures toward superior environmental performance.

- Implement an EMS consistent with ISO 14001
- Continue integrating sustainability principles into your operations
- Enhance your current recycling projects so that a greater percent of solid waste is diverted to recycling
- Work to reduce the amount of hazardous waste generated from previous year's amounts
- Reduce energy consumption by a to-be-set percentage each year
- Further reduction of wastewater amounts sent to the Milwaukee Metropolitan Sewage District
- Set ambitious goals for stormwater management
- Educate the entire workforce on sustainable practices and activities

I congratulate you for your significant past commitment to environmental excellence, and look forward to your continual leadership in this area.

By entering the Green Tier program and through your commitment to an Environmental Management System (EMS), you will systematically identify opportunities for environmental improvement. By one year from the date of this letter, your EMS should either be certified to the ISO 14001 standard or documented as functionally equivalent (see attached guidance).

The Green Tier statute requires that you 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 delay 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 detailing 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 the commitments reflected in this letter. 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 to Mark McDermid with a copy to your single point of contact by March 15, 2011, and annually thereafter.

We also ask that you address the attached list of generic environmental indicators in your annual report, especially those related to Perlick's identified objectives and targets. This additional reporting 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.

As a participant in the Green Tier Program, you are entitled to Deferred Civil Enforcement, as described in 299.83(6m)(d). In brief, this means that if you discover a violation with an existing environmental requirement, and if you provide us notice of your discovery along with a corrective action plan and timeline that conforms to the requirements in the statute, and if you successfully and timely implement the corrective action plan, we will not seek to impose penalties on Perlick for the violation. You are reminded that nothing in this acceptance letter replaces any obligation that you have to report on, and correct, any violation of law or regulation.

This letter authorizes Perlick 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 Perlick as a Green Tier participant on the DNR website.

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 use stakeholders in the development of

objectives and targets. We also ask that you describe this and other communications with concerned entities in your annual report.

Finally, if you have any questions about your interaction as a Tier 1 participant with the DNR, Mike Griffin has been assigned as your single point of contact. Please coordinate with Mike on an annual meeting that will be used to brief the DNR on your environmental performance, and the progress made on the objectives and targets. This meeting shall also be used for the DNR to provide input on the objectives and targets to be set for the coming year.

I want to welcome you as a Tier 1 participant. As our working relationship evolves and specific environmental and business opportunities arise, please know the Green Tier program is prepared to help develop a customized working relationship with Perlick under the terms and conditions of Tier 2.

Sincerely,

/s/ Matt Frank

Matt Frank, Secretary
WI Department of Natural Resources

Attachment: Tier 1 Application
Generic Suite of Green Tier Indicators
Functional Equivalency Guidance
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		
Douglas Graf	Environmental Manager, Maintenance Supervisor		
Street Address	City	State	ZIP Code
8300 Good Hope Rd	Milwaukee	WI	53223-0000
Telephone Number	Fax Number	E-mail Address	
(414) 353-7000	(414) 353-5751	dmg@perlick.com	

II. Facility Information

Facility Name	County		
Perlick Corporation	Milwaukee		
Street Address	City	State	ZIP Code
8300 Good Hope Rd.	Milwaukee	WI	53223-0000
Mailing Address	City	State	ZIP Code
8300 Good Hope Rd.	Milwaukee	WI	53223-0000

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

FID 241017370

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.

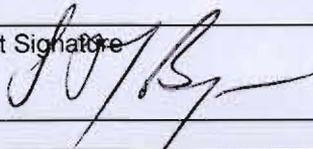
If a waiver is requested, please provide information describing any requirements not met and a justification for the waiver request on a separate page labeled **Attachment 5**. Note that waivers will be granted only in exceptional circumstances.

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

5/28/09

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

X. For Department Use Only

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

Attachment 2
May 2009

Perlick Corporation past and current environmental performance.

1. Paint Booth – The paint booth was eliminated. This reduced the amount of VOCs emitted from the facility from a substantial amount to almost zero. Removal of painting operations also eliminated the hazardous waste generation in the painting process from paint filters, overspray paint, gun cleaning, and off specification paint. The spray painting booth elimination also eliminated energy usage required to heat the system further eliminating the production of carbon dioxide. This also eliminated the need for a water wash system and water treatment facility. This provided a reduction in the amount of water sent to the Milwaukee Metropolitan Sewage District for treatment and a dynamic reduction in water usage.
2. Aerosol painting – Aerosol touch up painting was reduced to painting the ends only of piping systems. This reduced the amount of spray painting 75% to a volume of less than 40 10oz. cans per year.
3. Degreasing – The trichloroethylene degreaser was eliminated in December 2008 in favor of n propyl bromide. This resulted in elimination of Trichloroethylene as a VOC as well as reduced employee exposure.
4. Urethane foam system – Foam was removed in May 2008 and replaced with Ecomate a environmentally friendly alternative foam system.
5. Solder venting – Installation of smog-hogs to capture soldering fumes eliminated the emission of Pb and Ag emissions due to soldering activities.
6. Copper plating system elimination – The elimination of copper plating resulted in the elimination of cyanide usage in the facility.
7. Boiler systems back-up – Propane was eliminated as a back up system for boiler usage. This eliminated the need for an on site bulk propane tank.
8. Solvent spot touch up cleaning – A 142 flash naphtha was substituted for Stoddard and Toluene in clean up activities in the facility as much as feasible. This reduced hazardous waste generation and VOC emissions.
9. Metal recycling – A contract with All Metal recycling was initiated to allow All Metal to take all waste material and remove metal containing scrap. This eliminated two 32 cubic yard dumpsters of waste in the local landfill per week.
10. Skid recycling – All wood skids are now recycled resulting in a reduction of waste into the local landfill.
11. Perlick has a vigorous paper recycling program for all white paper and cardboard at the facility. No paper is allowed in any trash sent from the facility. Perlick currently recycles 15 – 16 cubic feet bins of paper per month. Cardboard is baled and recycled weekly.
12. Electrical lights – Perlick has instituted a complete electrical lighting change in the facility. All lights have been changed from T12s to T8s. A total of 1700 lights were removed and exchanged. This results in a return on investment of 8 months due to the increased energy saving. Reduced electrical savings results in a reduction in carbon dioxide emissions.
13. Electronic waste – All electronic waste is collected and disposed of at CRT Processing in Janesville Wisconsin through Badger Disposal. All electronic components are dismantled and reprocessed in the United States. No electronics are allowed to be shipped overseas.
14. Nickel and Chrome plating - Nickel and Chrome plating continues to be done at the facility. All plating operations are under complete control and follow restrictions to reduce emissions. Perlick has had no emission problems since the start of air permit controls and Perlick has applied for a revocation of the Title V air permit in favor of a ROP to cover future emission controls.