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August 31, 2017

Mr. Jason Lasky
Executive Vice President
Sadoff Iron & Metal Company
240 W. Arndt Street
Fond du Lac, WI 54935

Subject: Welcome to Green Tier – Tier 1

Dear Mr. Lasky:

Congratulations! We are glad to welcome Sadoff Iron & Metal Company's Oshkosh Facility into Tier 1 of Green Tier. You join a select group of participants who are committed to superior environmental performance.

To recognize your environmental accomplishments and your commitment to future environmental performance, we will highlight your facility's successes on the Department of Natural Resource's Green Tier website to document your progress overtime.

Each Green Tier participant is matched with a single point of contact at DNR. Laurel Sukup has been assigned as your single point of contact. She can be reached at 608-267-6817 or at Laurel.Sukup@wisconsin.gov. Please contact her with any questions concerning communications, required approvals, or technical assistance you may need.

For your convenience, we have attached a Commitment Outline. This document identifies the benefits of being a Green Tier participant and important dates that affect your participation.

Again, welcome to the Green Tier program. My staff and I are excited to embark on our new relationship with you. We look forward to assisting you with your commitment to continuous improvement and superior environmental performance.

Sincerely,

/s/ Cathy Stepp

Cathy Stepp
Secretary

Cc: Laurel Sukup

Attachments: Green Tier Commitment Outline
 Green Tier Logo Files and Guidance CD
 Green Tier Annual Report Guidance

**Green Tier Commitment Outline for
Sadoff Iron and Metal Company**
Oshkosh Facility

Approval Date – August 31, 2017

Commitment Outline Updated: (02/07/2020)

The updates since participation started are:

- Updated general content, format and links
- Updated Project Coordinator
- Updated Single Point of Contact
- EMS Established

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 agreed to implement your EMS on or before **August 31, 2018**. Within 30 days please email your EMS implementation date to: GreenTier@Wisconsin.gov, your Project Coordinator, and your Single Point of Contact (SPOC).

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **August 31, 2018** 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, **August 31, 2020** 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 **June 30, 2018** and annually thereafter. (Please feel free to discuss alternative reporting dates with your Project Coordinator 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. In your application you identified the following environmental commitments:
- 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: GreenTier@Wisconsin.gov and your Single Point of Contact.

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: Marcy McGrath, Phone 920-662-5167, Marcy.McGrath@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: Weston Wegener, Phone: 608-264-9753, Cell: 608-284-0908, Weston.Wegener@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

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: Jason Lasky Title: EVP
Street Address: 240 W. Arndt Street Fond du Lac, WI City: Fond du Lac State: WI ZIP Code: 54935
Telephone Number: 920-921-2070 Fax Number: _____ E-mail Address: laskyj@Sodoff.com

II. Facility Information

Facility Name: Sodoff Iron & Metal Company County: Winnebago
Street Address: 3 1/2 E. 10th Ave City: Oshkosh State: WI ZIP Code: 54902
Mailing Address: FTN: 2285 FID: 471111520 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:

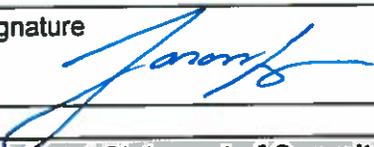
- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

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 4/17/2017
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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 2-

Sadoff Iron & Metal Company/Sadoff E-Recycling & Data Destruction

Our vision is to be the preferred choice in commodity recycling. Our mission to accomplish this is to incorporate customer focus, attain operational excellence, find innovative solutions, and manage risk. We do this through investment in our people, teamwork, and adhering to the standards of excellence.

Leading the scrap metal recycling industry

For over 60 years, Sadoff Iron & Metal has offered scrap metal recycling with prompt, professional service, competitive pricing, and environmental focus. We're known for our integrity; building trust with customers as we help improve their processes and bottom-lines.

We call our unique approach "Down To Earth" recycling. It means we combine our environmental responsibility with easy-going, customer-focused attention. We're proud to offer scrap management programs that not only make the planet greener, they make our customers some green, too.

EHS VALUES AND PRINCIPLES



- We value human life above all else and manage risks accordingly.
- We relentlessly pursue and continually improve Environmental, Health & Safety (EHS) systems and processes.
- We do not compromise our EHS Value for profit or production.
- We comply with all laws and set higher standards for ourselves and our suppliers where unacceptable risks are identified.
- We support pollution prevention and sustainable development by incorporating social responsibility, economic success, and environmental excellence into our decision making process.
- We measure and assess our performance and are open and transparent in our communications.
- We supply and use safe and reliable products and services.
- We use our EHS knowledge to enhance the safety and well being of our communities.
- We are all accountable for conforming with and deploying our EHS Values and Principles.

Continuous Improvement:

Sadoff believes in continuous improvement for all aspects of our business, and in line with that philosophy we recognize the benefits of utilizing formalized management systems to ensure process and organizational controls. Pursuant to this, select Sadoff Iron & Metal Company facilities have been certified to the ISO 9001:2008 international quality standard. Our Oshkosh, WI facility has been identified as our next site to move from compliance to certification for the ISO 9001:2008 standard.

The business activities at our Oshkosh facility have historically been related to the collection, processing and shipment for ferrous and nonferrous scrap metal materials used by steel mills and foundries. In 2017 the company made the strategic decision to further develop capabilities for the collection, processing and shipment of electronics items at our Oshkosh location. The company developed a sub-brand to allow more awareness and marketing to be attributed to these new efforts. Known as Sadoff E-Recycling & Data Destruction, this initiative provides us the opportunity to better market our capabilities. The following is our strategic list of improvements that we intend to make over the next 12 months.

- Achieve certification to the ISO 2001:2015 standard
 - Goal: to be completed by February 2018
- Achieve certification to the ISO 14001 Standard
 - Goal: to be completed by March 2018
- Achieve certification to the OSHAS 18001 Standard
 - Goal: to be completed by March 2018
- Achieve certification to the R2 standard
 - Goal: to be completed by March 2018

Achieving certification to the above standards, leading up to receiving R2 certification, will allow us to compete on a more equal ground as our regional competitors which will provide a greater basis for us to achieve greater recycling rates for electronic items.