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State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor
Cathy Stepp, Secretary
Telephone 608-266-2621
FAX 608-267-3579
TTY Access via relay - 711



March 23, 2012

Terry Moede
1102 Jefferson St
Algoma, WI 54201

Subject: Welcome to Green Tier

Dear Mr. Moede:

Congratulations! We are glad to welcome you into Green Tier. You join a group of companies who are not only committed to superior environmental performance but also to superior economic performance.

In recognizing your past accomplishments and future commitments we promise to work towards promoting and recognizing your facility for taking the lead in environmental protection while assuring economic stability and growth. We are committed to publicizing WS Packaging as a Green Tier participant on the DNR website. Undoubtedly, there will be other opportunities to bring the attention of your accomplishments to the forefront, and we hope to assist you in any manner possible in doing so as a Green Tier partner.

Michelle Farley has been assigned as your single point of contact. She can be reached at 920/262-5495 or at michelle.farley@Wisconsin.gov. Please contact Michelle with any questions concerning communications, required approvals, or technical assistance you may need. For your convenience the attached guidance outlines your benefits and important dates that affect your participation.

On behalf of the Wisconsin Department of Natural Resources, I am proud to extend this welcome to you. We are committed to working with you to build a customized relationship under the Green Tier Program. I am excited to embark on our new relationship and my staff is ready to assist as your business grows.

Sincerely,

/S/ Cathy Stepp

Cathy Stepp
Secretary

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

Green Tier Commitment Outline for WS Packaging Group, Inc. – Algoma WI

Approval Date – March 23, 2012

Commitment Outline Updated: 02/10/2020

The updates since participation started are:

- Change of 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/CO503.pdf>

You have agreed to implement your EMS on or before **March 31, 2013**. Within 30 days please email your EMS implementation date to: GreenTier@Wisconsin.gov, and your Single Point of Contact (SPOC), Michelle.Farley@Wisconsin.gov.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **March 31, 2013** 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, **March 31, 2015** 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 30th, 2013** 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 submit Green Tier Annual Reports to: GreenTier@Wisconsin.gov, and your Single Point of Contact (SPOC), Michelle.Farley@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: Michelle Farley - DNR, Phone 920-662-5495, Cell 920-492-0342, Michelle.Farley@Wisconsin.gov

- B. **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



Green Tier Application

Notice: Collection of this information is authorized under s. 299.83 Wis. Stat. Participation in Green Tier and completion of this form are voluntary. Personal information collected on this form, including such data as your name, address, phone number, etc., will be used in the implementation of Green Tier and will be made broadly available under the Green Tier program. Information will also be made accessible to requesters under Wisconsin's Public 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		
AJ Bonnell	Project Specialist		
Street Address	City	State	ZIP Code
1102 Jefferson Street	Algoma	WI	54201
Telephone Number	Fax Number	E-mail Address	
1-920-487-6174	1-920-487-6245	abonnell@wspackaging.com	

II. Facility Information

Facility Name	County		
WS Packaging Group, Inc.	Kewanee		
Street Address	City	State	ZIP Code
1102 Jefferson Street	Algoma	WI	54201
Mailing Address	City	State	ZIP Code
1102 Jefferson Street	Algoma	WI	54201

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:

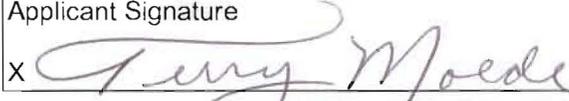
- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

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
X 	X 6/7/2011

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



WS Packaging Group, Inc.[®]

Leaders in Printing and Packaging Worldwide

Attachment #2

Past, Current and Future
Environmental Performance

Sustainability and Environment

The increasing focus on sustainable packaging is more than just a "hot" socioeconomic topic. Depending on the priorities and business strategies of the brand owner, it can include:

- Brand enhancement and differentiation
- Increased sales and customer loyalty
- Enhanced corporate citizenship
- A corporate culture that can attract and retain employees

WS Packaging Group supports the efforts of brand owners to improve their long-term push toward sustainability by offering cost-effective packaging solutions. To that end, we have established a formal environmental policy built around protecting our environment, conserving energy, and conserving natural resources. Our goals are to ensure our facilities and business operations are in compliance with or exceed federal, state, and local environmental standards and to provide products that are environmentally compatible throughout their lifecycles.

Measuring sustainability: a key industry driver

Increasingly, major retailers are asking, or even mandating, suppliers to evaluate themselves relative to other suppliers, based on the sustainability of their packaging, including material value, recycled content, recovery value, product/package ratio, and innovation. Directives such as these are pushing brand owners to search for sustainable solutions. WS Packaging is able to help in a variety of ways.

We can source and print on certified recycled materials or alternative materials from renewable resources. Exciting new developments are taking place all the time in this area, enabling us to recommend alternatives, such as solvent-free thermal transfer ribbons, as our suppliers develop and bring them to the marketplace. We can also provide the documentation on sustainable raw materials to meet your "chain of custody" requirements or restriction of hazardous chemicals compliance.

Reducing the packaging footprint

By minimizing the amount of material needed to package products, and often eliminating excess packaging components, we offer sustainable packaging options that help brand owners reduce their environmental impact but still maintain overall effectiveness, meet regulatory requirements, and enhance brand presence.

Products such as our patented MultiVision® line of extended text labels allow companies to include extra label panels of instructions, drug facts, or multiple languages and apply them to bottles or tubes – without the need for additional packaging, such as a unit carton, blister pack, or insert.

On retailer request, Insight Pharmaceuticals LLC, eliminated the unit carton for its new Anacin® Advanced Headache Formula. As an over-the-counter drug, Anacin Advanced is required to meet stringent regulatory labeling requirements. We solved the problem with our patented EasyTab® extended text label from the MultiVision® label line. Removing the chipboard box for 219 million units resulted in saving 16.9 million square inches of paperboard. Total cost savings were \$.50 per package.

Reducing waste

Our Lean Manufacturing initiatives focus on improving production areas directly related to sustainability. And one of the most critical areas we evaluate is waste.

We measure all waste produced and take calculated steps to reduce it. We even deliver profit sharing based on its reduction—in this way, everyone is responsible for eliminating waste. We pay to have over 800 tons of matrix waste, which was produced in the printing process, converted into fuel pellets each month. This allows the waste to be reused as a fuel source and keeps it out of the landfill. We also have recycling programs in all of our plants for office paper waste, recycled plastics, aluminum, and other materials.

Our sustainability efforts to reduce waste have also created a paperless ordering process that includes electronic quoting, order acknowledgment, and invoicing. With WebFlex™, our online asset management system, customers can upload artwork, manage inventory, place orders, track shipments, and reconcile invoices. WebFlex is efficient, paperless, and convenient.

We recycle over 1,200 tons of paper, corrugated, and other materials per month.

Reducing emissions

We have dramatically reduced VOC emissions at our plants by switching from analog to digital plate-making. In fact, all our plate-making facilities have been converted to this environmentally sound practice. In addition, we use water-based inks in almost all of our applications, a practice with much safer cleanup and disposal options than solvent-based inks.

This state-of-the-art process was acknowledged by the state of Wisconsin when WS Packaging won a TLMI's Environmental Award for VOC reduction. One of our plants reduced VOC output by 40,000 pounds annually.

Reducing costs further

Printed material is one component of a label or packaging project—how it is shipped is another. We have manufacturing facilities across the U.S. and in Mexico. In most cases, we produce our customers' projects near their filling and production facilities to reduce the amount of fuel needed for transportation.

As a way to further reduce waste and packaging costs, we use our customers' corrugated shipping boxes to ship their products we manufacture for them. They in turn re-use the boxes to ship their finished product. In one instance, two million boxes were eliminated from the waste stream. We also offer a "box-free" pallet system, incorporating corner guards and core plugs to eliminate the use of corrugated boxes altogether.

WS Packaging Group: a progressive leader in the printing industry

We're committed to innovation that delivers sustainable packaging solutions that impact your brand and your bottom line, while helping protect the environment.

We were awarded the 2009 Business Friend of the Environment Award for Environmental Innovation for setting the standards for environmental innovation and stewardship to protect our communities and the 2009 Manufacturing Awards of Distinction: Innovate 360 Award for our outstanding sustainable products and business practices.

We've been recycling and removing waste long before it was popular. We continue to measure our energy use reduction and pursue renewable energy options through our utilities providers. We adhere to responsible environmental practices at all our manufacturing facilities and invest in sustainable initiatives as we work toward additional formal certifications of LIFE: Label Initiative for the Environment, which was awarded to our Algoma, WI facility in October 2010.

Near Future:

We are currently working with our "Sister" facilities located in Neenah and Oak Creek Wisconsin to complete their certification process for TLMI. Once this process has been completed we are intending to have those facilities apply for Green Tier Certification.



WS Packaging Group, Inc.

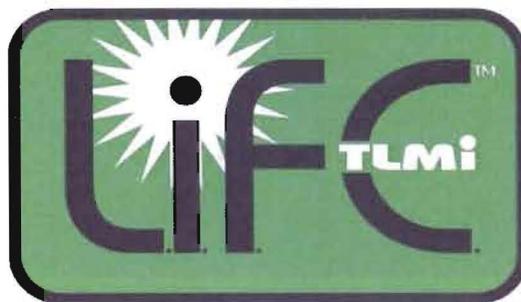
Leaders in Printing and Packaging Worldwide

Attachment #3

Functional Equivalence
To ISO 14001 Standards

TLMI's

Label Initiative For The Environment



These are the L.I.F.E. Scorecard Instructions



Revised: November 23, 2009



**Project L.I.F.E.
Label Initiative for the Environment**

Scorecard Instructions

- 1) Enter the name of your company and the specific manufacturing facility being scored, the date the scorecard was completed, and the name of the individual who completed the scorecard.
- 2) Place a 'Y' in the column that best captures the level of engagement in the activity listed in each row.

The criteria for evaluating your current involvement and the corresponding Score are listed below.

Column	Score
Not Applicable: This activity is not applicable to this facility.	NA
No Activity: We have not engaged in this activity at this facility.	No Activity
Investigating: We are currently investigating the development of a project or program at this facility.	Acceptable
Engaged: We have established formal engagement in this activity, either by undertaking a particular project, or developing formal programs. We have established a list of oportunities, goals and control and measurement systems.	Good
Public reporting: We have publicly reported our performance, program, and targets. Public reporting includes printed materials or a website.	Better
Improvement from previous year: In addition to publicly reporting our performance, we have met our annual improvement target.	Best
Performance Measurement: This column captures our performance in this category for the reporting year.	Not captured in Score

- 3) A rating for this level of performance (e.g., No Activity, Acceptable, Good, Better, Best) will automatically update in the 'Score' column.
- 4) Enter the amount of any performance improvement in this requirement in the previous year, using the unit of measurement listed. This is not included in your score.
- 5) Enter any comments or detail on your score in each activity in the column marked 'Comments'. **Please note that supporting documentation must still be submitted for certain levels.**
- 6) Instructions for how to become certified are available in L.I.F.E. Instructions.docx

Company Name	WS Packaging Group, Inc. - Algoma - Jefferson St.	Date Completed	10/1/2010
Enter Facility Identification (eg Address or Name)	1102 Jefferson St., Algoma, WI 54201	Completed By	Terry Moede

	Not Applicable	No Activity	Investigating	Engaged	Public Reporting	Improvement from Previous Year			
1.0 Clean Production Techniques	This requirement is not applicable to my facility	No activity has been conducted.	This activity is being investigated at the facility.	The facility is actively engaged in this activity.	The details of the formal program, metrics, and targets are publicly available	Facility has demonstrated improvement from previous year	Score	Environmental Management	Comments
1.1 Releases to Air	Enter NA	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank			
1.1.1 Program to decrease facility VOC, HAP and UV releases to air					Y		Better	Reduced by 8 ton from 2008 to 2009.	
1.1.2 Program to use best management practices to avoid other releases to air				Y			Good	Reduced amount of nitrogen purchased by 126,477 lbs. in 2009.	
1.2 Releases to Water									
1.2.1 Program to decrease quantity of facility releases of water				Y			Good	Preventive maintenance Program in place on all faucets.	
1.2.2 Program to minimize releases into waste water				Y			Good	Program in place to test all water before releasing into the public drinking system.	
1.3 Waste									
1.3.1 Program to minimize solid waste sent to landfill from production				Y			Good	Reduced amount of landfill waste from 10% in 2008 to 3% in 2009.	
1.3.2 Program to minimize solid waste sent to landfill from office and facility				Y			Good	30 tons of OCC & 36 tons of office paper recycled in 2009.	
1.3.3 Program to ensure proper disposal of hazardous waste					Y		Better	Increased from 3169 lbs. of Haz Waste in 2008 to 6422 lbs. in 2009.	
1.3.4 Program to recycle or encourage recycling of liner material from customers				Y			Good	We have partnered with a recycling company to offer pick up of liner from our customers and send it in for recycling.	
1.4 Office and Facility									
1.4.1 Policy and programs for using environmentally preferable cleaning practices in facility and office			Y				Acceptable	Increased to 11% of cleaning products that are environmentally preferable.	
1.4.2 Policy and program to give purchasing preference to environmentally preferable materials such as office supplies, paper, equipment, etc.			Y				Acceptable	Presently using remanufactured toner for all copier machines. Investigating recycled paper on all copy machines.	
1.4.3 Program to increase use of environmentally preferable packaging materials or practices for shipping				Y			Good	Patented product construction of extended text labels has eliminated the need for a carton.	
1.5 Compliance Violations									
1.5.1 Program to eliminate compliance fines, violations, and complaints				Y			Good	Zero fines or violations for 2009.	

CERTIFICATION NOTE: In order to apply for certification, the facility must demonstrate that no significant violations, fines, or complaints were incurred in the previous year. In addition the facility must score "Engaged" or better for at least 10 requirements of Sections 1, 2 and 3, and score "Engaged" in all of Section 4 for Management.

Company Name	WS Packaging Group, Inc. - Algoma - Jefferson St.	Date Completed	10/1/2010
Enter Facility Identification (eg Address or Name)	1102 Jefferson St., Algoma, WI 54201	Completed By	Terry Moede

	Not Applicable	No Activity	Investigating	Engaged	Public Reporting	Improvement from Previous Year	Score	Performance Measurement	Comments
2.0 Energy and Greenhouse Gases	This requirement is not applicable to my facility	No activity has been conducted.	This activity is being investigated at the facility.	The facility is actively engaged in this activity.	The details of the formal program, metrics, and targets are available to the public.	Facility has demonstrated improvement from previous year.			
2.1 Energy Use	Enter NA	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank			
2.1.1 Program to increase energy efficiency of production, offices and facilities				Y			Good	Energy efficient lights installed. LED EXIT lights installed. Motion sensors installed in offices.	
2.1.2 Program to increase energy efficiency of distribution fleet		Y					No Activity	No activity at this time.	
2.2 Greenhouse Gases									
2.2.1 Program for greenhouse gas management		Y					No Activity	No activity	
2.2.2 Program to increase use of renewable energy			Y				Acceptable	Investigating purchases of blocks of renewable energy.	
2.2.3 Program to offset greenhouse gas emissions		Y					No Activity	No measurement at this time.	

Company Name	WS Packaging Group, Inc. - Algoma - Jefferson St.	Date Completed	10/1/2010
Enter Facility Identification (eg Address or Name)	1102 Jefferson St., Algoma, WI 54201	Completed By	Terry Moede

	Not Applicable	No Activity	Investigating	Engaged	Public Reporting	Improvement from Previous Year	Score	Performance Measurement	Comments
3.0 Product Design	This requirement is not applicable to my facility	No activity has been conducted.	This activity is being investigated at the facility.	The facility is actively engaged in this activity.	The details of the formal program, metrics, and targets are publicly available	Facility has demonstrated improvement from previous year			
3.1 Integration of Environmental Performance into design	Enter NA	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank		Enter amount and unit of measurement	
3.1.1 Program to design output and process to minimize waste in production and application				Y			Good	Roll Waste Stock was reduced to 12.6 % in 2009	
3.1.2 Program to work with customer to design graphics to minimize processing and material and energy use				Y			Good	Programs in place to reduce material waste with size adjustments. Test program started to recycle flexo plates.	
3.2 Environmentally Preferable Materials									
3.2.1 Program to use environmentally preferable facestock and tagstock materials			Y				Acceptable	We offer environmentally preferable facestock to our customers	
3.2.2 Program to use environmentally preferable adhesives and fasteners			Y				Acceptable	We offer environmentally preferable adhesives to our customers	
3.2.3 Program to use environmentally preferable liner material				Y			Good	Several customers have switched to PET liner.	

Company Name	WS Packaging Group, Inc. - Algoma - Jefferson St.	Date Completed	10/1/2010
Enter Facility Identification (eg Address or Name)	1102 Jefferson St., Algoma, WI 54201	Completed By	Terry Moede

	Not Applicable	No Activity	Investigating	Engaged (Prereq for Certification)	Public Reporting	Improvement from Previous Year	Score	Performance Measurement	Comments
4.0 Management Practices	This requirement is not applicable to my facility	No activity has been conducted	This activity is being investigated at the facility	The facility is actively engaged in this activity.	The details of the formal program, metrics, and targets are publicly available	Facility has demonstrated improvement from previous year			
4.1 Overall management of business operations	Enter NA	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank	Enter Y or leave blank			
4.1.1 Policy that outlines Environmental Commitment				Y			Good	Environmental Policy in place	
4.1.2 Policy to review environmental risks				Y			Good	Developed an Environmental Aspects Identification form to identify our risks.	
4.1.3 Programs to monitor performance				Y			Good	Quarterly Environmental Inspection checklist completed and submitted to Corporate	
4.1.4 Policy to set annual continual improvement objectives and targets				Y			Good	WSPG Sustainability Scorecard completed annually.	
4.1.5 Program to develop Environmental Best Practices Awareness				Y			Good	Conducted an employee involvement program in 2009 with Green Month contest and newsletters.	
4.1.6 Programs outlining Emergency Response procedures				Y			Good	Spill Response Team in place. Crisis Management & Emergency Action Plan in place.	
4.1.7 Program to ensure corrective and preventative action management				Y			Good	Corrective Action Plan using the Environmental Non-compliance Investigation Form.	
4.1.8 Program to ensure regular performance review				Y			Good	Internal Audit procedures in place.	
4.1.9 Program to ensure proper maintenance of equipment				Y			Good	Annual Maintenance Program is in place.	

Certification Note: in order to apply for certification, all of the above requirements must meet at least the 'Engaged' level and at least 10 requirements from other sections.



Sustainability Policies & Procedures		
1.0 Clean Production Techniques		
1.1 Releases to Air	Performance Measurement	References for obtaining measurements
<p>1.1.1 Program to decrease facility VOC, HAP, and UV releases to air</p> <ul style="list-style-type: none"> ➤ Many solvent-based inks have been replaced by water-based inks and UV inks. ➤ Total VOCs emitted has been reduced by over 68% over the past nine years.* ➤ Digital platemaking technology has eliminated film processing materials, chemicals, and solvents. ➤ Our employees are trained in our Hazard Communications program to ensure all chemicals containers are labeled. 	<p>VOCs emitted were 30.2 ton in 2002. Our VOC emissions have been reduced by 68%. VOCs emitted in 2009 were 9.7 ton.</p> <p>Our goal is to reduce it by 5% in 2010.</p>	<p>Annual Air Emissions Inventory Summary Report</p> <p>Terry Moede Calendar Year</p>
<p>1.1.2 Program to use best management practices to avoid other releases to air</p> <ul style="list-style-type: none"> ➤ All exhaust stacks are at 25 feet above the ground. ➤ All used solvent or shop towels are stored in a closed metal container and sent out weekly for laundering ➤ It is company policy that all solvent parts cleaners' covers are closed when not in use. ➤ All screw-in drum top funnels must keep lids closed when not adding waste. ➤ Investment was made for a new more efficient nitrogen tank that has greatly reduced the amount of nitrogen being released into the atmosphere during high-pressure situations. ➤ The majority of our inks and varnishes have zero HAPs. All other inks and varnishes have very minimal HAPs. 	<p>Nitrogen purchased in 2008 was 225,902 lbs.</p> <p>Nitrogen purchased in 2009 was 99,425 lbs.</p> <p>Our nitrogen purchased was reduced by 56%.</p> <p>Our goal is to reduce it by 5% in 2010.</p>	<p>Annual Air Emissions Inventory Summary Report</p> <p>Terry Moede Calendar Year</p>

<p>1.2 Releases to Water</p>		
<p>1.2.1 Program to decrease quantity of facility releases of water</p> <ul style="list-style-type: none"> ➤ Preventive Maintenance Program on all faucets ➤ With the switch to our digital platemaking technology, we no longer need a still for reclaiming solvents. The still required non-contact cooling water that had been disposed of into the city sewer system. 	<p>Water usage for: 2008 = 1,267,900 gal. 2009 = 1,293,600 gal.</p> <p>Our goal is to reduce our usage in 2010 by 3%.</p>	<p>Request from Algoma Utilities</p>
<p>1.2.2 Program to minimize releases into waste water</p> <ul style="list-style-type: none"> ➤ All of our water-based waste inks and rinse go through a waste water treatment device. All hazardous parts of the waste are removed and fully encapsulated before being sent to the landfill. Remaining water is clear and sent to the city sewer system. <ul style="list-style-type: none"> ○ Each batch of pretreated wastewater is tested and logged before released into the city sewer.* 	<p>9,500 gallons of water are treated per week</p> <p>Our goal is to have 100% of all releases into the city sewer system free from any hazardous substances.</p>	
<p>1.3 Waste</p>		
<p>1.3.1 Program to minimize solid waste sent to landfill from production</p> <ul style="list-style-type: none"> ➤ 40% of our previous landfill waste is now sent to a facility to convert the waste into fuel pellets. ➤ It is our goal to increase the waste percent no longer sent to the landfill to 50% ➤ All corrugated materials are sent in to be recycled. ➤ The following items are sent in to recyclers: aluminum, copper, steel, monitors, computers, fluorescent bulbs, plastic bottles, cell phones, and batteries. 	<p>3,363 tons of waste hauled to the landfill in 2007 & zero tons recycled. 3,169 tons hauled to the landfill in 2008 & 321 tons recycled. (10%) 2,081 tons of waste hauled to the landfill in 2009 & 1,289 tons recycled. (38%) Our goal is to increase recycled waste to 50% in 2010.</p>	<p>Garbage /Recycling Report</p> <p>Terry Moede</p> <p>Gary Denil Maintenance other recycling</p>
<p>1.3.2 Program to minimize solid waste sent to landfill from office and facility</p> <ul style="list-style-type: none"> ➤ Each person in the office has a waste basket as well as a blue "recycle" basket. 	<p>30 tons of occ (old corrugated cartons) and 36 tons of mixed office paper were recycled in 2009.</p>	<p>Obtain from Blue Waters</p>

<ul style="list-style-type: none"> ➤ Mixed scrap office paper is shipped separately to be recycled. ➤ Office employees are encouraged to print on both sides of paper. ➤ Common documents are stored on SharePoint intranet site instead of printing documents for each person's file. 	<p>Our goal is to increase both of those quantities by 5% in 2010.</p>	
<p>1.3.3 Program to ensure proper disposal of hazardous waste</p> <ul style="list-style-type: none"> ➤ We have a Hazardous Waste Program in place. <ul style="list-style-type: none"> ○ Our "Hazardous Waste Program" describes policies and procedures to meet WI DNR compliance for hazardous waste. ○ Procedures are in place for the proper handling of hazardous waste. ○ Documentation of all hazardous waste shipments are kept on file. ○ All aerosol cans are punctured, emptied, and recycled. ○ 6,422 lbs. of hazardous waste were shipped 	<p>In 2009, we shipped out 6,422 lbs. of hazardous waste.</p> <p>Our goal is to reduce our hazardous waste in 2010 by 5%.</p>	<p>Annual Hazardous Waste Report</p> <p>Terry Moede</p>
<p>1.3.4 Program to recycle or encourage recycling of liner material from customers</p> <ul style="list-style-type: none"> ➤ We have partnered with a recycling company that specializes in liner recycling. Based on their area of the U.S., customers are given the specifications for the program and referred to the closest recycling center for their liner disposal. The recycler company has release liner service centers located in nine different cities throughout the United States to make it easier and more convenient for customers to recycle their liner. 	<p>In 2009, we had no customers that partnered with us on a liner recycling program.</p> <p>Our goal is to have at least two customers in 2010.</p>	<p>Obtain information from Mary Hyde (Marketing Dept.)</p>
<p>1.4 Office and Facility</p>		
<p>1.4.1 Policy and programs for using environmentally preferable cleaning practices in facility and office</p> <ul style="list-style-type: none"> ➤ Approximately 11% of our cleaning supplies are non-toxic, biodegradable, non-hazardous, non-flammable, and non-corrosive. We propose to increase that to 22%. ➤ Cleaning products with no or low VOCs are used wherever possible. 	<p>11% of cleaning products used are biodegradable, non-hazardous, non-flammable, and non-corrosive.</p> <p>Our goal is to replace more cleaning products with eco-friendly cleaners</p>	<p>Obtain information from Maintenance Dept. (Cleaning Personnel)</p>

<ul style="list-style-type: none"> ➤ Each custodial employee has been trained in Hazard Communications. They know and understand that they must read and follow product labels and use only the amount needed. Cleaning procedures are in place. ➤ We have invested in an automated "Flexowash" plate cleaner, which has eliminated the process of cleaning plates by hand with alcohol and acetate. ➤ We have invested in an automated "Flexowash" anilox roll cleaner, which uses a less corrosive chemical for cleaning and has reduced exposure to employees, who are cleaning rolls by hand. ➤ As part of our waste reduction/energy reduction program, an air hand dryer has been installed in one of the bathrooms and the paper toweling dispenser removed. If this trial is successful, we would install air hand dryers in all bathrooms and eliminate usage of paper toweling. ➤ All bathroom tissue and paper toweling purchased are composed of 100% recycled fiber. 	<p>and raise that % to 22%.</p>	
<p>1.4.2 Policy and program to give purchasing preference to environmentally preferable materials such as office supplies, paper, equipment, etc.</p> <ul style="list-style-type: none"> ➤ We use centralized purchasing/leasing for office equipment, consumable supplies, etc. <ul style="list-style-type: none"> ○ Mandates staged approval process for purchase ○ Standardizes product lines ○ Deploys (leased) copier products company wide ○ Eliminates uninformed product purchase decisions ➤ All copier machines use remanufactured toner, which eliminates toner cartridges from going into the landfill. 	<p>No measurement at this time.</p>	<p>Purchasing Dept.</p>
<p>1.4.3 Program to increase use of environmentally preferable packaging materials or practices for shipping</p> <ul style="list-style-type: none"> ➤ Customer supplied boxes <ul style="list-style-type: none"> ○ Final product shipping boxes supplied by the customer are used for label order returns 	<p>No measurement at this time.</p>	<p>Customer Service Dept.</p>

<ul style="list-style-type: none"> ○ One customer measured reusable box program resulting in seven tons of corrugated saved each year ➤ Unique product-stacking configuration <ul style="list-style-type: none"> ○ Corrugated boxes(2MM) are eliminated entirely ○ Product is placed directly on the shipping pallet ○ Corner reinforcement and shrink film protection ➤ PATENTED PRODUCT CONSTRUCTION <ul style="list-style-type: none"> ○ Our MultiVision® product line of extended text labels provides additional label space through multi-layer extended text constructions ○ Eliminates the use of cartons, folded instruction sheets, and associated costs, by having all the required consumer information right on the bottle or tube ○ We produce linerless labels, eliminating the liner waste product and disposal expense ○ We offer a product prototypes or “mock-ups” service for new sustainable packaging ideas, label designs, alternate materials, new constructions, and POP/POS for new product lines 		Vision Team (Jake LeCloux)
<p>1.5 Compliance and Violations</p>		
<p>1.5.1 Program to eliminate compliance fines, violations, and complaints</p> <ul style="list-style-type: none"> ➤ Each WSPG facility completes a quarterly Corporate Environmental Compliance Checklist and submits it to the Corporate Environmental Director ➤ Our facility deploys 6S principles. All employees have been trained and each production department must complete a daily 6S checklist. ➤ Each WSPG facility completes a Quarterly Risk Management Score Card. Twenty-six different safety directives are listed, completed, and recorded on an annual basis. ➤ Our facility is AIB compliant and must pass an annual audit to retain that status. The audit includes inspection of operational methods and personal practices, maintenance for product 	<p>Our facility had zero fines or violations in 2009.</p> <p>Our AIB audit score was 915 out of 1000 (Superior) in June 2010.</p> <p>Our goal is to get an AIB audit score of 920 or higher in 2011.</p>	<p>Corporate Environmental Director</p> <p>QA Manager</p>

<p>safety, cleaning practices, integrated pest management, and adequacy of production safety programs.</p>		
<p>2.0 Energy and Greenhouse Gases</p>		
<p>2.1 Energy Use</p>		
<p>2.1.1 Program to increase energy efficiency of production, offices and facilities</p> <ul style="list-style-type: none"> ➤ A facility energy team was established in January of 2010 to find ways to reduce energy usage and costs and eliminate waste. ➤ Lighting motion sensors have been installed in all bathrooms, in the new remodeled customer service department, and in other various parts of the facility ➤ An air leak study was completed in May, 2010. ➤ In the last year, we made significant capital investment in technology that reduces energy waste during roll changes during shut-down and re-starting. ➤ 50 % of all "EXIT" signage lights have been switched over to LED lighting. ➤ We are investigating installation of LED "Egress" lighting outside of the building. ➤ Three rooftop AC units were upgraded within the past year to more energy efficient models ➤ We are looking at establishing office temperature guidelines/limits for each season. ➤ All portable heaters have been removed from the customer service department. 	<p>50 % of all "EXIT" lights have been switched over to LED lighting.</p> <p>Our goal is to have 100% of all "EXIT" lights switched over to LED lighting.</p> <p>In 2009 our Gross Annual Sales/Annual Energy Usage in kWh = \$1.3826/kWh</p> <p>In 2010 our goal is decrease that number by 2%.</p>	<p>Maintenance Supervisor & Environmental Director</p>
<p>2.1.2 Program to increase energy efficiency of distribution fleet</p>	<p>No measurement at this time.</p>	

2.2 Greenhouse Gases		
2.2.1 Program for greenhouse gas management	No measurement at this time.	
2.2.2 Program to increase use of renewable energy <ul style="list-style-type: none"> ➤ Investigating purchase of renewable energy through our utility company <ul style="list-style-type: none"> ○ We can purchase 100 blocks or more per month ○ Cost: Industrial rate of \$2.00/300 kWh block ○ Purchasing 307 blocks = 25% of consumption on one account (\$614.00) ➤ Meeting with contractors for potential installation/trial of wind turbines. 	In 2009 no renewable energy was purchased. Our goal is to purchase 1% renewable energy in 2010.	Sustainability Committee
2.2.3 Program to offset greenhouse gas emissions	No measurement at this time.	
3.0 Product Design		
3.1 Integration of Environmental Performance into Design		
3.1.1 Program to design output and process to minimize waste in production and application <ul style="list-style-type: none"> ➤ We have formed a waste committee, focused on waste reduction plant wide. ➤ We utilize lean manufacturing processes and tools, such as Kaizen events, to gather ideas/suggestions from all areas and functional line personnel for waste reduction solutions. ➤ We have created a model and are actively focusing on material SKU consolidation. To date, we have eliminated 59 SKU's, reducing the likelihood of obsolescence and subsequent waste. ➤ In the last year, we made significant capital investment in technology that reduces waste due to shutting down and starting back up with roll changes. 	In 2009 our Roll Waste Stock / Total Material Used was 12.6% Our goal for 2010 is to reduce that waste to 12.5% In 2009 our total \$\$ of R&A (Returns & Allowances) / Label Sales was .79%. Our goal for 2010 is to reduce that	Lean Team (Corie Zimmerman)

<ul style="list-style-type: none"> ➤ We are developing environmentally friendly coatings that may reduce the consumption of over-laminate films. ➤ We have worked with major customers to create a recycling program for silicone liner. ➤ We have major accounts that have eliminated the use of corrugated boxes in shipping, utilizing a skid pack design. ➤ Order by the roll rather than the master (Exact, TIPS, precise, etc. - no off cuts) ➤ Order only what is needed per job requirements within the allowable over/under run percentage (less chance of unassigned inventory) ➤ SKU rationalization: <ul style="list-style-type: none"> ○ Consolidate purchases to use tier one suppliers ○ Consolidate SKU's ○ Consolidate sizes within a SKU ○ Move away from minimum buy materials ○ Set target materials per category (i.e. WHG, SG, foil, etc.) ➤ Unassigned material inventory plan <ul style="list-style-type: none"> ○ Roll up ○ Substitute ○ Slit ○ Use for make ready ○ Sell <ul style="list-style-type: none"> ▪ Transfer to another WSPG facility ▪ Roll exchange/ broker ○ Donate to local technical school ➤ Yearly review of job costing to verify actual vs. estimated waste and make-ready on repeat jobs. ➤ No-stretch wrap program" on the pallets for direct material shipments received from suppliers. 	<p>rate to .50%.</p> <p>In 2009 our Average Initial Set up time was 53 minutes per set up.</p> <p>Our goal for 2010 is to reduce that set up time to 45 minutes.</p>	
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<p>3.1.2 Program to work with customer to design graphics to minimize processing and material and energy use</p> <ul style="list-style-type: none"> ➤ Expanded Gamut printing/ 6- and 7-color process: Ink stations set up with the same inks to reduce change overs and setup. More efficiency gained at press, less material used for setup and possibly fewer plates. ➤ Plate Recycling: Our vendor has stated they would like to beta the collection of used flexo plates for a recycling program. We responded that we would like to be part of that test program. ➤ Recommend a size adjustment (width) to reduce material waste and better fit the master roll width. ➤ Recommend a size adjustment to utilize in-house tooling rather than purchase new. ➤ Recommend a size adjustment (length) to utilize existing magnetic cylinder rather than purchase a new engraved die. ➤ Recommend a size adjustment to run more across on press – running more efficiently and reducing run time on press. ➤ Look at the possibility of digital production vs. flexographic to eliminate plate and art charges. ➤ Offer our patented MultiVision® extended text labels with multiple-ply construction to eliminate extra packaging such as carton, instruction sheet, etc. 	<p>No measurement at this time.</p> <p>Case study on file for carton, etc. reduction example</p>	<p>Estimating Dept.</p>
<p>3.2 Environmentally Preferable Materials</p>		
<p>3.2.1 Program to use environmentally preferable facestock and tag stock materials</p> <ul style="list-style-type: none"> ➤ We offer our customers materials that create more sustainable packaging such as: <ul style="list-style-type: none"> ○ Recycled papers <ul style="list-style-type: none"> ▪ Composed of 10% to 100% post consumer waste. ○ Dissolvable papers <ul style="list-style-type: none"> ▪ Washes away with either cold or hot water 	<p>No measurement at this time.</p>	<p>Purchasing Dept.</p>

<ul style="list-style-type: none"> ○ Tree-Free papers made of fibers from fast growing plants such as: <ul style="list-style-type: none"> ▪ Sugar Cane ▪ Bamboo ▪ Hemp ▪ Cotton Linters ○ Biodegradable films <ul style="list-style-type: none"> ▪ Made from regenerated cellulose ○ Bio-plastic films <ul style="list-style-type: none"> ▪ Made from renewable resources, rather than petroleum, including: <ul style="list-style-type: none"> • Starch • Corn > PLA film • Cellulose > Acetate <p>➤ We offer our customers paper that is FSC / SFI certified.</p>		
<p>3.2.2 Program to use environmentally preferable adhesives and fasteners</p> <ul style="list-style-type: none"> ➤ To facilitate the reuse of containers, we offer our customers a dissolvable adhesive that can be cleanly removed. ➤ We offer our customers a recycle-compatible adhesive. <ul style="list-style-type: none"> ○ Allows paper fibers and adhesive to be separated in the recycling process. <ul style="list-style-type: none"> ▪ Permits envelopes, papers, catalogues, etc. containing PS labels to be recycled without contaminating the recycled product. <p>We offer our customers a water-based acrylic adhesive and solvent-free silicone.</p> ○ Minimizes hazardous waste and air emissions 	<p>No measurement at this time.</p>	<p>Purchasing Dept.</p>
<p>3.2.3 Program to use environmentally preferable liner material</p> <ul style="list-style-type: none"> • Natural Kraft Liner <ul style="list-style-type: none"> ○ Performs the same as white liner. ○ Does not require bleach, chlorine dioxide, or die. ○ Can be recycled with other paper liners. • PET Liners <ul style="list-style-type: none"> ○ Thinner than paper. 	<p>No measurement at this time.</p>	<p>Purchasing Dept.</p>

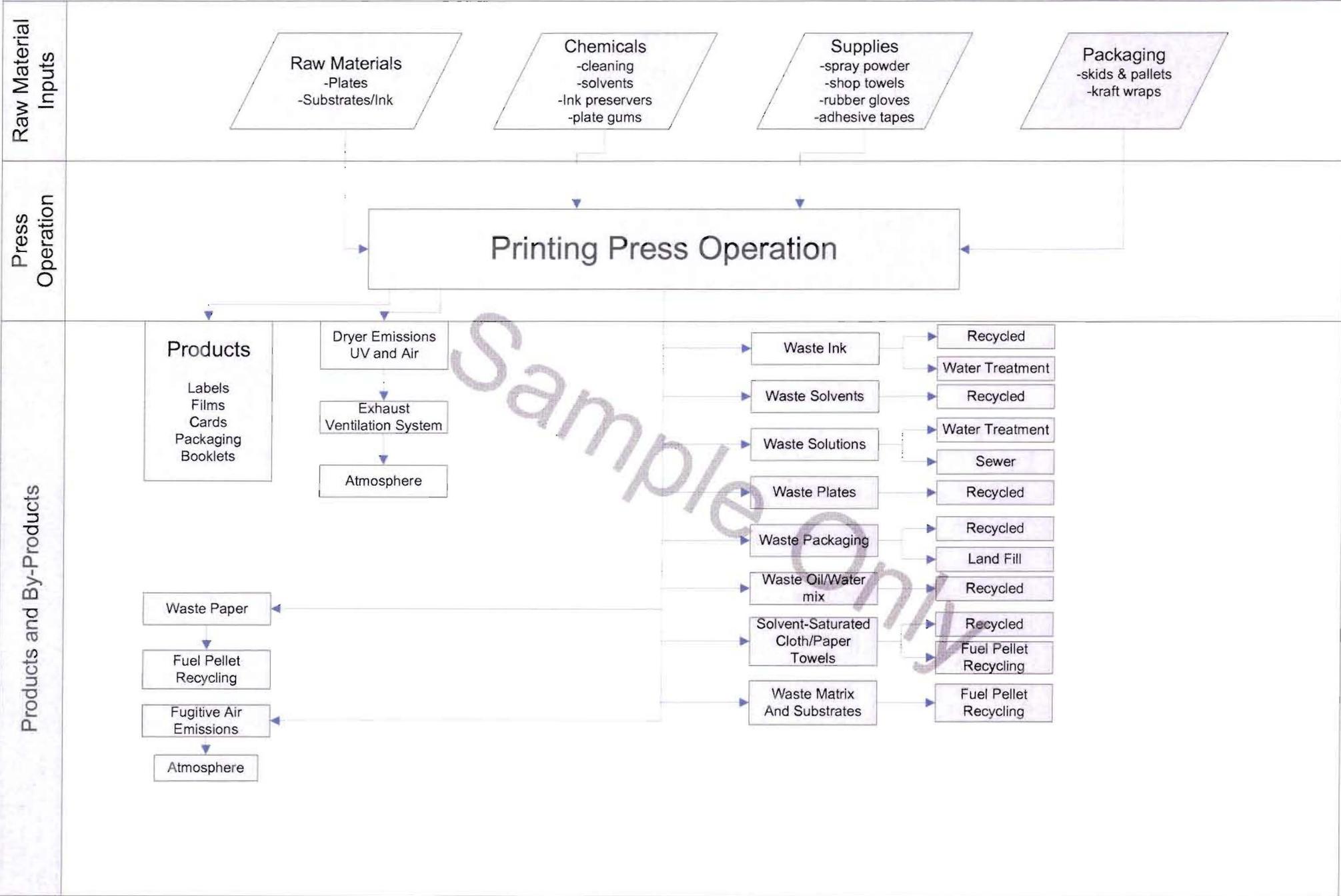
<ul style="list-style-type: none"> ○ Creates less waste. <p>NOTE: Silicone-coated release liner, butt rolls, jumbo rolls, and obsolete stock can be recycled by companies such as Channeled Resources. They have 8 locations in the USA and 1 location in Canada. Please see more information at their website: http://www.channeledresources.com.</p>		
<p>4.0 Management Practices</p>		
<p>4.1 Overall Management of Business Operations</p>		
<p>4.1.1 Policy that outlines Environmental Commitment</p> <ul style="list-style-type: none"> ➤ Our Environmental Policy is stated as follows: At WS Packaging Group, we operate our business as a corporate citizen committed to sound social, ethical, and environmental management, which includes protecting our environment, managing our energy use, and conserving natural resources. Our goals are to ensure that our company facilities and business operations comply with federal, state, and local laws and sustainable standards and to provide products that are environmentally sound throughout their lifecycles. We conduct our operations in an environmentally responsible manner and develop sustainable packaging improvements and solutions for our customers. We believe that an appropriate balance can and should be achieved between environmental goals and economic health and performance. 	<p>No measurement</p>	<p>Environmental Director</p>
<p>4.1.2 Policy to review environmental risks</p> <ul style="list-style-type: none"> ➤ Each Department has conducted an inspection of the waste, water discharge, air emissions, etc. using the "Environmental Aspects Identification Form". ➤ All solvents are stored in an "Explosion Proof" room. This room has a floor drain that drains into a holding tank. The room is designed to prevent any spills from escaping into the environment. 	<p>No measurement at this time.</p>	<p>Environmental Director</p>

<ul style="list-style-type: none"> ➤ All Hazardous Waste barrels are stored with a containment unit underneath to prevent spills from getting into the environment or into a sewer drain. 		
<p>4.1.3 Programs to monitor performance</p> <ul style="list-style-type: none"> ➤ All usage of inks, coatings, and solvents are recorded electronically. Every bottle that goes to press has a bar code and is scanned. Reports are computed monthly and are documented to determine the amount of VOCs emitted for the month. ➤ An annual Air Emissions Inventory Summary Report is submitted to the Wisconsin DNR. ➤ A spreadsheet is kept on file and is updated daily to calculate the amount of material that is sent to the local landfill and to the local recycler to be converted to fuel pellets. 	<p>No measurement at this time.</p>	<p>Environmental Director</p> <p>Quarterly Environmental Checklist</p>
<p>4.1.4 Policy to set annual continual improvement objectives and targets</p> <ul style="list-style-type: none"> ➤ Corporately we have formal metrics for multiple key business objectives. We have set objectives for improvement, specifically for waste reduction and energy usage reduction ➤ As a facility, we develop an annual formal Strategic Action Plan to address improvement efforts. We then meet quarterly with each department to review our progress in our strategic plan. ➤ Each WSPG facility must complete a Sustainability Scorecard. The scorecard is designed to apply a score to 41 separate items that cover Clean Production Techniques, Energy Efficiency, Recycling, and Management Practices. 	<p>Our facility score on the WSPG Scorecard for 2009 was 92.</p> <p>Our goal is to score 95 or higher in 2010.</p>	<p>Environmental Director</p>
<p>4.1.5 Program to develop Environmental Best Practices Awareness</p> <ul style="list-style-type: none"> ➤ A corporate Sustainability Committee was established in 2008. ➤ All new employees are trained in Safety and General Manufacturing Practices before they begin employment. ➤ Each month our facility has a mandatory facility-wide meeting for all employees, educating and sharing progress and ideas. 	<p>No measurement at this time.</p>	<p>Environmental Director</p>

<p>Production, Quality, Lean, Safety, and Sustainability are standard topics of each month's presentation.</p> <ul style="list-style-type: none"> ➤ Employees have become involved through our Green Month Program which included: <ul style="list-style-type: none"> ○ Green Month News letters ○ Green Month Contest with prizes ○ Sharing and implementation of "Green Ideas" that were submitted by the employees ➤ Recycling programs are in place to recycle all eligible items and reduce waste volume sent to the landfill. ➤ Each WSPG facility is required to complete an "Environmental Compliance Self-Assessment Guide". <ul style="list-style-type: none"> ○ Attachment: Environmental Self-Assessment Guide 		
<p>4.1.6 Programs outlining Emergency Response procedures</p> <ul style="list-style-type: none"> ➤ A Spill Response Team is composed of employees that are trained annually. There are employees from each shift on the team. ➤ Procedures are in place for employees to follow when dealing with hazardous waste. ➤ There is an Emergency Response Team comprised of employees from all three shifts. Each member has been trained in first aid and in the use of the defibrillator. ➤ WSPG has a "Business Continuity Plan Playbook" designed to ensure the survival of the company. ➤ WSPG has a "Crisis Management and Emergency Action Plan" that outlines procedures in case of an emergency. ➤ All new employees attend a New Employee Orientation and are educated on the emergency response procedures in this facility. 	<p>Our goal is to add environmental- and sustainability-related topics to the WSPG "Business Continuity Plan Playbook" in 2010.</p>	<p>Environmental Director</p>
<p>4.1.7 Program to ensure corrective and preventative action management</p> <ul style="list-style-type: none"> ➤ Our Safety Program's policy ensures we conduct an investigation for every accident and incident of "near miss". <ul style="list-style-type: none"> ○ An Accident Investigation Form is used to determine the "root cause" of an accident, and corrective actions are 	<p>No measurement at this time.</p>	<p>Environmental Director</p>

<p>determined with a target date and a person accountable for completion.</p> <ul style="list-style-type: none"> ○ A “Supervisor’s Near Miss Report” is completed whenever an incident occurs and there are no injuries. The form is designed to determine the root cause of the incident and create an action plan to prevent reoccurrence. ➤ Our Safety Committee performs monthly safety audits of departments. All non-compliance items are recorded in the Safety Meeting minutes, assigned to a person for correction, and given 30 days to correct. ➤ Operating Procedures are in place to assign responsibilities for documenting non-conformities as reported by customers. ➤ WSPG has a “Crisis Management and Emergency Action Plan” that outlines procedures in case of an emergency. 		
<p>4.1.8 Program to ensure regular performance review</p> <ul style="list-style-type: none"> ➤ An “Internal Audit Procedure “ is used to audit each of the environmental items on an annual basis. 	<p>No measurement at this time.</p>	<p>Environmental</p>
<p>4.1.9 Program to ensure proper maintenance of equipment</p> <ul style="list-style-type: none"> ➤ An annual Maintenance Program is in place for all presses. ➤ We plan to install an annual Maintenance Program for all Rewinders. ➤ A preventive Maintenance Program is in place for all printing presses. ➤ There are several ‘External” Maintenance Programs in place for various high tech machines. ➤ Inspection of all HVAC units is completed annually. ➤ All press operators must attend and pass a Press Operator Certification class. ➤ An audit for Air Leaks was performed in 2008 & 2010. ➤ A program is in place for preventive maintenance of all UV cassettes. The life of UV bulbs are tracked and monitored. 	<p>Our goal is to perform audits for Air Leaks at least annually.</p>	<p>Environmental Director</p>

<ul style="list-style-type: none">➤ All scissors lifts are inspected annually by an outside contractor.➤ All forklifts are inspected semi-annually by an outside contractor.➤ The Quality Assurance Department calibrates the following instruments semi-annually: scales, rub tester, and digital calipers. The following instruments are calibrated annually: bar code scanner, micrometer, digital force gauges, and the pull tester.		
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Environmental Aspects Identification



Auditor: Terry Moede (Corp. Envir/Safety Director)
 Audit Date: 10/05/2010

WSPG Facility: Algoma Label Plant (100)
 Contracted? N/A

Process / Activity: Flexo-Printing
 Process / Activity Location: Press Room

Raw Material Inputs				
Parts				
Paper Liner, Poly Films, Magnet stocks and Foils				
Chemical Material				
Water Based and UV Inks, Adhesives, Solvents, Varnishes, Additives and Cleaners				
Energy Use				
	Usage			
Type:	High	Medium	Low	
Electricity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Natural Gas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Propane	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Steam	N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Compressed Air	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hydraulics	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other Input				
Nitrogen Gas				
Water Use				
	Usage			
Type:	High	Medium	Low	
Clean-Up	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Additive	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Provide a brief description of Process/Activity
 Manufacturing of Flexo Labels per customers needs.

Optional: Attach and circle photo, schematic, sketch drawing, detailed description.

Product Outputs	
Label Products, paper, poly films, magnet stock and foils	
Air Emissions (Include Noise/Odor)	
VOC's, some noise and some odor	
Waste By Products (Solid & Liquid) Check If Recycled	
Matrix	<input checked="" type="checkbox"/>
Paper	<input checked="" type="checkbox"/>
Poly Films	<input checked="" type="checkbox"/>
Cores-Corrugated	<input checked="" type="checkbox"/>
Core Plugs (Plastic)	<input checked="" type="checkbox"/>
Aluminum H-Clips	<input checked="" type="checkbox"/>
Skids/Pallets	<input checked="" type="checkbox"/>
Excess Inks:	<input checked="" type="checkbox"/>
Water base	<input checked="" type="checkbox"/>
UV (Hazardous Waste)	<input checked="" type="checkbox"/>
Adhesives	<input checked="" type="checkbox"/>
Coatings/Varnishes	<input checked="" type="checkbox"/>
HP-Digital	<input checked="" type="checkbox"/>
Hazardous Waste (Oil Water)	<input checked="" type="checkbox"/>

WATER

Water Discharges			
N/A			
On Site Treatment Type			
N/A			

Information Supplied By: Tim Feld (TRP)

Audit Participants: AJ Bonnell (Project Specialist)



Upon completion of this form, please scan the completed form in as a PDF and e-mail it to:

Terry Moede (TMoede@wspackaging.com)

Or, print out the form and FAX it to:

Terry Moede (920) 487-5644