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## Green Tier Commitment Outline for Winsert, Inc.

Approval Date – November 26, 2007

Commitment Outline Updated: (02/07/2020)

The updates since participation started are:

- Updated general content, format and links
- Updated Project Coordinator

### I. Environmental Management Systems (EMS) & Audit Requirements

Your EMS must either be ISO-certified, or you must demonstrate that it is functionally equivalent. For information on how to demonstrate the functional equivalency of your EMS, please see: <https://dnr.wi.gov/files/PDF/pubs/co/CO503.pdf>

You have supplied us with a copy of your ISO 14001 certification, satisfying initial Green Tier EMS requirements.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **November 26, 2008** and every year after that, you must perform an environmental management system audit. The department recommends that your first audit be completed by a DNR-approved outside environmental auditor.
- B. On or before, **November 26, 2010** and every third year, this audit **must** be completed by a DNR-approved outside EMS auditor. The list of approved auditors can be found at: <https://dnr.wi.gov/topic/GreenTier/Auditors.html>

### II. Provide an Annual Report

- A. **Annual Report Due Date** - We have mutually agreed that the deadline for your Green Tier annual report is **January 31**. (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.
- 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](mailto:GreenTier@Wisconsin.gov) and your Single Point of Contact.

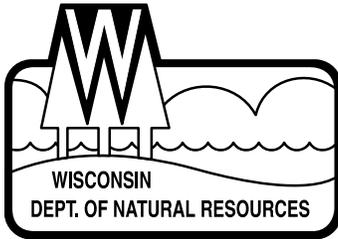
### III. Work toward Superior Environmental Performance

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: Michelle Farley, Phone 920 - 662 - 5495, [Michelle.Farley@Wisconsin.gov](mailto:Michelle.Farley@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](mailto:Weston.Wegener@Wisconsin.gov).
- E. **Minimum Inspection Frequency:** Because you have implemented an EMS, you are entitled to inspections at the lowest frequency permitted by the programs under law. The department will work with you to determine how this will work for you.
- F. **Deferred Civil Action:** You are entitled to Deferred Civil Enforcement as described in statutes (299.83(6m)(d)). If you discover a violation of an existing environmental requirement, you are entitled to protection from any civil penalties that the department might otherwise impose if you:
  - 1. Notify the department
  - 2. Provide a corrective action plan and documentation of your Environmental Management System (EMS) adjustments that ensure the violation will not happen again, and
  - 3. Correct the violations within 90 days



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Matthew J. Frank, Secretary

101 S. Webster St.  
Box 7921  
Madison, Wisconsin 53707-7921  
Telephone 608-266-2621  
FAX 608-267-3579  
TTY Access via relay - 711

November 26, 2007

Paul Lemery  
VP of Administration  
Winsert, Inc.  
2645 Industrial Parkway South  
Marinette, WI 54143

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Mr. Lemery:

Congratulations! The Wisconsin Department of Natural Resources (DNR) is pleased to approve your application and accept you into Green Tier. This letter of acceptance covers all facilities and activities outlined by your application. This letter is issued in accordance with the Environmental Results Program Act as authorized by Wisconsin Statute section 299.83, effective May 1, 2004, when 2003 Wisconsin Act 276, commonly referred to as the "Green Tier Law", was signed into law.

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

By entering the Green Tier Program, you have agreed to develop and pursue goals to improve your environmental performance beyond compliance through the implementation of an Environmental Management System (EMS). You have also committed to perform an annual audit of your EMS, with every third audit performed by an outside environmental auditor approved by the department.

As a part of your commitments, you have agreed to submit to DNR an annual report regarding your participation in the program. These reports should provide an update of your current objectives and targets, as well as discuss any measured progress made toward those stated in your EMS or on your application. You should also present the results of your annual EMS audit, describing any non-conformances discovered by it and identifying actions taken or proposed to correct them. Your first report should be submitted no later than January 31, 2009.

We also ask that you consider addressing the attached list of generic environmental indicators in your annual report, especially those related to Winsert's identified objectives and targets. This additional reporting is completely voluntary, but it can help to quantify your successes beyond those explicitly outlined in your application or EMS. This information will also help us paint a broad picture of the environmental performance of all Green Tier participants.

Our experiences have shown that organizations realize significant benefits from working regularly with an external group of interested stakeholders. As your participation in Green Tier matures, we would encourage you to consider collaborating with the department to develop such a group. We also ask that you describe this or any other communications with concerned entities in your annual report.

In recognition of Winsert's diligent environmental stewardship as a Green Tier participant, DNR commits to inspect Winsert at the lowest frequency permitted by law, unless DNR has reason to believe the facility is out of compliance. In addition, you are entitled to Deferred Civil Enforcement as described in Wisconsin Statute section 299.83(6m)(d). In brief, if you discover either a non-conformance with your EMS or a violation of an existing environmental requirement, provide us notice of your discovery along with a corrective action plan that conforms to the requirements in the statute. DNR will not seek to impose penalties on Winsert for the non-conformance or violation provided Winsert successfully implements the corrective action plan in a timely manner. Please note that nothing in this acceptance letter replaces any obligation that you have to report and correct any violations of law or regulation.

This letter authorizes your company to use the Green Tier logo on written materials related to your facility. Please see the attached guidelines for further information regarding the use of the logo. Furthermore, you will receive a certificate that recognizes Winsert's participation in Green Tier. The department has committed to annually celebrate your participation in the program through a press release, and will publicize Winsert as a Green Tier participant on the DNR website.

Finally, the department will work with you to designate your single point of contact. You will be able to contact your SPOC with any questions concerning communications with the department, approvals you may be required to obtain, or for any technical assistance you need.

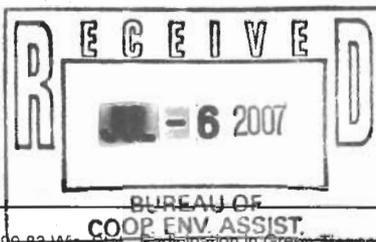
I want to welcome you as a Tier 1 participant in Green Tier and encourage you to work toward Tier 2 status in the future.

Sincerely,

/s/ Matthew Frank

Matthew J. Frank, Secretary  
Wisconsin Department of Natural Resources

Attachments: Tier 1 Application  
Generic Suite of Environmental Indicators  
Green Tier Logo Guidelines



# Green Tier Application

Form 4800-022 (Rev. 3/06)  
Page 1 of 2

**Notice:** Collection of this information is authorized under s. 299.02 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: Paul A. Lemery Title: VP Administration  
Street Address: 2645 Industrial Parkway S. City: Marinette State: WI ZIP Code: 54143  
Telephone Number: 715-735-8124 Fax Number: 715-732-2824 E-mail Address: paul.lemery@winsert.com

## II. Facility Information

Facility Name: Winsert, Inc. County: Marinette  
Street Address: 2645 Industrial Parkway S. City: Marinette State: WI ZIP Code: 54143  
Mailing Address: P.O. Box 198 City: Marinette State: WI ZIP Code: 54143

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:

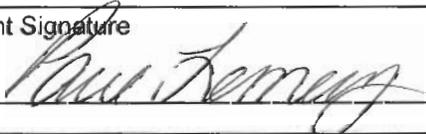
- All enforcement record requirements relevant to this application are satisfied.
- All enforcement record requirements relevant to this application are **not** currently satisfied. A waiver of the enforcement record requirements is requested.

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 3<sup>rd</sup> 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 7/1/2007
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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

Winsert is a privately held company that has just celebrated its 30<sup>th</sup> anniversary. Founder and current CEO, Stephen A. Dickinson, has always been a leader on environmental issues. He has always run his company behind his vision of environment first. That is why we first became ISO-14001 certified in May of 2003. It is also the reason we recycled long before it became "popular." Years ago, Steve made the decision that we would no longer bring in new processes that used hazardous chemicals and are continuing to this day to remove those processes that do. If a process used hazardous materials, it would not be used at Winsert. This was also why we do not allow suppliers to bring in hazardous materials. Each MSDS is verified prior to the material being brought in and they are saved and accessed through an electronic system used by all employees.

We have used outside firms for roughly the last 20 years to audit Winsert to the highest standards and assist in making sure Winsert is always in compliance with all regulations. Although we can maintain compliance without the extra costs of a third party auditor, Steve was so committed that he always went the extra mile. We eliminated an in-house molding process, even though it costs us more, just so we could eliminate the chemicals it used. Some of those chemicals were SO<sub>2</sub> gas, caustic soda, sulfuric acid and a very strong oxidizer. The replacement molds we now purchase are non-hazardous. While watching our molding process, it was noticed that there was time during normal operation that the gas was running and not producing goods. New equipment was designed and built to drastically reduce the waste of natural gas.

Winsert currently has several environmentally projects and goals in-process right now under the direction of Steve's daughter and COO Trisha La Via. She shares the same concern for the environment as Steve. We are currently redesigning our crack detection and burr removal process to eliminate our only source of process waste water. Right now, the water goes through the process, then to our treatment system and then down the drain. Once completed, we will have significantly reduced our water usage, waste water and will have eliminated our need for a waste water treatment system.

Our only hazardous waste right now is waste trichloroethylene. About 8 years ago we made changes to the system that allowed us to go from a large quantity hazardous waste generator to a very small hazardous waste generator. This was not good enough for Trisha. We are currently in a final testing stage of a new process that will eliminate the need for trichloroethylene forever. Once completed, Winsert will no longer be a generator of any hazardous waste. This will be a significant accomplishment for any company, especially for one that produces all of its goods from raw materials in a foundry though a machine shop.

Attached and included in this application (attachment 3) are copies of our Objectives and Goals.

# CERTIFICATE

TUV Rheinland of North America, Inc.



Hereby certifies that

**Winsert, Inc.**

**2645 Industrial Parkway**

**Marinette, WI 54143**

has established and applies an environmental management system for the

## **Manufacture and Sales Of High Alloy Components**

An audit was performed and documented in Report No. 2240  
Proof has been furnished that the requirements according to

**ISO 14001: 2004**

are fulfilled.

Certificate Registration No.

**74 300 2240**

The certificate is valid from  
**May 14th, 2006**

The certificate is valid until  
**May 13th, 2009**



*[Signature]*  
Certification Officer