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September 12, 2017

Kari Yunker
CEO
Yunker Industries, Inc.
310 O'Connor Drive
Elkhorn, WI 53121

Subject: Welcome to Green Tier – Tier 1

Dear Ms. Yunker:

Congratulations! We are glad to welcome the Elkhorn and Lake Geneva facilities of Yunker Industries into Tier 1 of Green Tier. You join a select group of companies 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. This will help you document your progress overtime.

Each Green Tier participant is matched with a single point of contact at DNR. Renee Lesjak Bashel has been assigned as your single point of contact. She can be reached at (608) 266 – 6977 or at renee.bashel@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 in Green Tier and the important dates that effect 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/ Kurt A. Thiede
Kurt A. Thiede
Interim Secretary

Cc: Thomas Eggert
Renee Lesjak Bashel
File

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

Green Tier Commitment Outline for Yunker Industries, Inc. – Elkhorn, WI

Approval Date – September 12, 2017

Commitment Outline Updated: 02-19-2020

The updates since participation started are:

- Change of annual report due date
- Change of audit due date to March 30th in 2019
- 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 demonstrated that your EMS is functionally equivalent, satisfying initial Green Tier EMS requirements.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **September 1, 2018** 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 EMS auditor.
- B. On or before, **March 30, 2020** 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 **April 30th each year**. (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), Renee.Bashel@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: Renee Lesjak Bashel – DNR, Phone 608-266-6977, Renee.Bashel@Wisconsin.gov.
- B. **Green Tier Logo:** Green Tier participants may use the Green Tier logo on stationery, promotional and educational materials related to your facility. Logo files as well as the Green Tier Style Guide with additional guidelines and information are available online at: <https://wi-dnr.widencollective.com/portals/nkc57xuv/GreenTierBranding>. Your Project Coordinator can provide you with the current access code.
- C. **Recognition:** Along with the certificate of recognition, the department will host a [participant web page](#) for easy reference. Participants should provide information and pictures on their environmental efforts to populate the webpage. We will also promote your successes throughout your tenure in Green Tier using a variety of DNR communication channels.
- D. **Project Coordinators:** You should also feel free to contact your Project Coordinator for Green Tier specific information. Project Coordinators provide support to SPOCs and participants providing reminders on Green Tier requirement dates and by promoting a participant's successes. Your project coordinator is: Jenni Birkholz, Phone 608-266-8226, Cell 608-514-2182, JenniferA.Birkholz@Wisconsin.gov.
- E. **Minimum Inspection Frequency:** Because you have implemented an EMS, you are entitled to inspections at the lowest frequency permitted by the programs under law. The department will work with you to determine how this will work for you.
- F. **Deferred Civil Action:** You are entitled to Deferred Civil Enforcement as described in statutes (299.83(6m)(d)). If you discover a violation of an existing environmental requirement, you are entitled to protection from any civil penalties that the department might otherwise impose if you:
 - 1. Notify the department
 - 2. Provide a corrective action plan and documentation of your Environmental Management System (EMS) adjustments that ensure the violation will not happen again, and
 - 3. Correct the violations within 90 days

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 Nadine Seitz	Title Marketing Manager		
Street Address 310 O'Connor Drive	City Elkhorn	State WI	ZIP Code 53121
Telephone Number 877-798-6537	Fax Number 262-723-3340	E-mail Address nseitz@yunker.com/mhuckstorf@yunker.com	

II. Facility Information

Facility Name Yunker Industries, Inc.	County		
Street Address 310 O'Connor Drive	City Elkhorn	State WI	ZIP Code 53121
Mailing Address 310 O'Connor Drive	City Elkhorn	State WI	ZIP Code 53121

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 (select one)
- b. Have you implemented an EMS that is functionally equivalent to ISO 14001? Yes No (select 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 Involvement

Please provide in a separate document labeled **Attachment 4** a list of interested persons whom you know or expect will have a strong interest in your Green Tier application. Tier 2 applicants must provide additional information about interested person 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 4.12.2017
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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

IV. Environmental Performance:

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:

- Yunker Industries has been actively managing and tracking our environmental performance for decades. We have lowered our air emission by over 80% since 2006. We have been Air Permit Exempt since 2011. To insure we maintain that exemption we maintain an internal Compliance Recordkeeping Program. The data from that program is reviewed by an outside Environmental Consultant on a quarterly basis.
- Our Hazardous Waste Stream has also been significantly reduced. We are currently a Small Quantity Generator and looking into qualifying for the Very Small Quantity Generator classification this year.
- Both of our facilities are Storm Water Exempt.
- In addition our solid waste stream is less than 20% of our total offsite waste shipments. We have been actively recycling most plastics, corrugated, paper, metal, glass and other recyclable materials for many years.

Describe your future plans for enhancing the environment with respect to the same facilities/activities:

- Yunker Industries has many potential projects for enhancing our environment. We have been evaluating a Zero Land Fill certification. At this point our landfilled solid waste is less than 15%.
- We are researching a full facility conversion to LED lighting for our Elkhorn facility.
- There is an ongoing effort to increase our recycling through an employee educational process. We are evaluating the use of additional recycled print materials and other products used in our facility.
- We are currently re-evaluating our Hazardous Waste Generator classification and looking to achieve the Very Small Generator classification based on our reduced waste stream.
- The facility water usage, while not used for any production operations is also being reviewed and we are considering some upgrades to low flow fixtures in the rest rooms.



Attachment 3

Supplement to SGP criteria to demonstrate a functionally equivalent EMS.
The following must be included with Attachment 3:

2. An analysis of the environmental aspects and impacts of an entity's activities.

Yunker Industries continues to look at ways to improve the impact within the environment and workplace. We perform various operational tests on a regular basis and share the results with all of our employees. Their feedback, comments and ideas are what help us to improve our sustainability efforts year after year.

- We have conducted a full review of the inks and solvents used in our facility. Based on the SDS data provided by the manufactures and zero VOC content of all the digital inks used in our Press Room we have determined that our indoor air quality is acceptable.
- The waste ink and cleaning solvent blend is classified as a Non-Hazardous waste for disposal purposes.
- In addition we have a significant volume of outside make-up air being brought in to the press room. The press room is isolated from the other parts of the facility. All of the entrance points to the room have doors that close off the area. The overhead doors to allow material movement in and out of the Press Room have remote power lift controls to minimize the amount of time they need to be open.
- The press room has a dedicated HVAC system designed to maintain a positive air flow during all production hours. This system will provide a minimum of 6 complete air changes per hour based on the design specifications. We have the HVAC engineering drawings on file that confirm these numbers.
- All of our routing and cutting systems located in the Finishing Department are connected to a Central Dust and Particle Collection System. The system is designed to remove and contain 98.98% of the dust. It will remove the dust particles as small as .05 micron. These engineering specifications provided by the manufacture are on file for reference.

5. A process for setting environmental objectives and developing appropriate action plans to meet the objectives.

The SGP Committee continues to meet yearly to set environmental goals, current and future CIP projects along with community awareness and health and well-being in the workplace. Once this is established they meet on a monthly basis or more depending on the importance and timeliness to implement the commitment.



- 1) **Sustainability Core Committee Members and Kari Yunker, President and CEO** make the decisions related to the selection of communications and identified audiences for any sharing of this information regarding our environmental and sustainability activities.
- 2) **Sustainability Core Committee Members, Purchasing and Sales Staff** communicate selected information on environmental and sustainability matters to our customers, vendors, suppliers, and community members by:
 - Sharing our Corporate Wide Commitment to Sustainability
 - Providing Tours of the facility
 - Responds to inquiries on environmental initiatives
 - Promotes benefits of sustainability in marketing materials
- 3) **Sustainability Core Committee Members** communicate selected information on environmental and sustainability matters to our employees by:
 - Posting news, sustainability committee agendas and minutes, along with related issues and potential projects on the company bulletin board.
 - Providing updates, when applicable, at our monthly company meetings
- 4) **Sustainability Core Committee Members** communicate to employees, on-site contractors, and suppliers whose responsibilities impact **Yunker** sustainability program:
 - Information on the sustainability program
 - Identifies job responsibilities that might impact the sustainability program and established procedures
 - Identified job responsibilities that might impact the annual continuous improvement process

Some Examples:

- In 2016 Yunker wanted to help its employees who smoked to quit by providing them with the resources such as hotline numbers, discounts on nicotine replacements and monthly seminars. This was the CIP project that the SGP Team committed to and was a success with: 29 smokers we had 4 that quit and 2 that switched to electronic cigarettes. As a result of this objective and success, Yunker has offered to continue this program and will be on-going in the years to come.
- Roof – An agreement between the building owner and Yunker Management resulted in a total reroofing project that increased the insulation R-value to over 40.
- Lighting- We are currently evaluating several LED lighting upgrades for both the interior and exterior lighting. The estimated energy savings could be over 100,000 Kwh annually. The amount of available rebates will have an affect how many of the existing fixtures we are able to convert.



8. A plan for taking actions to prevent environmental problems and for taking emergency response and corrective actions when environmental problems occur.

Yunker Industries is dedicated to the protection of its employees from emergencies such as tornadoes and fires. When emergencies do occur, our Emergency Action Plan (EAP) is initiated. This EAP is in place to ensure employee safety from emergencies during regular hours and after hours. It provides a written document detailing and organizing the actions and procedures to be followed by employees in case of a workplace emergency.

Please reference the attachment: Yunker Emergency Action Plan 2017

- Yunker Industries, Inc. has a contingency agreement plan through the SGIA (Specialty Graphic Imaging Association) group for SPIRE Members. SPIRE is the association of Presidents/CEO's of the top 50 screen and digital print companies that are located across the United States and Canada. In 2000, all members of SPIRE signed an agreement supporting the Disaster Recovery Initiative for any member company facing a disaster where production or fulfillment of orders is compromised. The agreement and commitment from the SPIRE members is to support all required services for another member company until the affected organization is able to rebuild and return to full operating capacity. In the event of a disaster, Yunker is centrally located and has the support of 8 SPIRE member organizations within a 150 mile radius of our facility. Each of these member organizations supports full service, large format screen and digital capabilities.
- All Yunker suppliers are required to have a disaster recovery plan equivalent to our own. Yunker utilizes an extensive qualification process for our vendor base. Performance is documented, measured and reviewed with all vendor partnerships on an ongoing basis to ensure that our suppliers meet or exceed our quality, service and delivery expectations.

10. Procedures for control of documents and for keeping records related to environmental performance.

Yunker Industries has put in place a document control procedure and policy.

Purpose: To ensure effective operation of the **Yunker Industries** SMS Manual, maintain the procedures of this SMS Manual, and keeps records of SMS initiatives, goals, processes and issues facing the Yunker Industries.



Procedure:

1. This SMS is a living document. To prevent unauthorized changes to this document only the SMS Management Representative has SMS Manual edit privileges.
2. To ensure use of the most recent SMS Manual, the Sustainability Committee maintains a revision history record for the **Yunker Industries** SMS Manual using Form SMS-14.
3. The Sustainability Committee notifies co-workers of changes to this SMS Manual and ensures all co-workers have access to the most recent version of this SMS manual.
4. The Sustainability Committee retains all SMS Manual documents for a period not less than 3 years.

Frequency: The revision history is amended as needed.

Records: **Nadine Seitz** maintains records of all current and outdated SMS Manuals in her office. Electronic copies are kept on the SGP drive for viewable access by all SGP members.

11. Environmental management system audits.

Yunker Industries conducted a self-audit of all areas of operations and has shared this information with the Executive Team to review any findings and offer solutions for improvements. We just went through an SGP Audit and were approved in February 2017. We would like to continue to work with our SGP/Green Tier approved auditors to conduct both the WI Green Tier and SGP Audits.

SMS Audit Procedure

Purpose: To assess performance and prevent and detect non-conformance with the components of **YUNKER INDUSTRIES** Sustainability Management System Manual.

Procedure:

- 1) A **YUNKER** management representative (or representatives) that is **NOT** a member of the sustainability committee annually reviews implementation of the SMS to ensure:
 - The Yunker Sustainability Policy is being upheld;
 - Each procedure described in this SMS document is carried out correctly;
 - Progress has been made in meeting sustainability-related performance objectives.

The management representative(s) bases the evaluation on objective evidence, documentation, records, and interviews with co-workers whose job responsibilities affect meeting sustainability and performance objectives. This evaluation shall not be considered a compliance audit.

- 2) The management representative uses the checklist in Form SMS-10 and writes up the findings of the audit using Form SMS-11. A "major non-conformity" occurs when an SMS procedure is clearly not being



implemented, when one of the commitments in the policy is not being upheld, or when no progress is being made in achieving an environmental objective; a "minor nonconformity" occurs when a procedure is being implemented inconsistently, yet without causing major failings in the SMS as a whole.

- 3) All non-conformities discovered are immediately referred for corrective action as outlined in the Corrective Action procedure for SMS Non-Conformance.

Frequency: The SMS audits are conducted annually.

Records: **Nadine Seitz** maintains records of Forms SMS-10 and SMS-11 in her office. Electronic copies are kept on the SGP drive for access by all SGP core members.



SGP Certificate

Certificate of Achievement



Presented to

Yunker Industries, Inc.

Elkhorn, WI

In recognition of achieving
SGP Certified Facility status

Certificate Number: 0217-1512151520
Expiration: 02/2019

Brittany Sutphin

Brittany Sutphin
Executive Director

SGP Audit Report – Please see attachment: Yunker Certification Report 2017