



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Scott Hassett, Secretary

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

September 26, 2006

Mr. Steve Vincelli, Plant Manager  
Federal Foam Technologies Inc.  
600 Wisconsin Drive  
New Richmond, WI 54017

Subject: Green Tier Acceptance Letter for Tier 1

Dear Mr. Vincelli:

The Department of Natural Resources (DNR) is pleased to approve your application and accept you into the Green Tier program. This letter of acceptance covers the Federal Foam Technologies (identified in your application). This letter of acceptance is authorized by the Environmental Results Program Act, 299.83, Wis. Stats., created by 2003 Wisconsin Act 276, which is commonly called the "Green Tier Law".

This letter of acceptance recognizes the work described in your application. Your participation in the Green Tier program is dependant upon your continuing commitment to superior environmental performance and continuous improvement. If future circumstances necessitate stepping back from this commitment, please notify us.

At a minimum, you have agreed to the following examples of superior environmental performance:

- 1) Improved environmental performance in at least the following areas:
  - a) Noise Reduction to specified targets for one of your process lines,
  - b) Increased Cardboard recycling,
  - c) Implement a returnable packaging program for material shipped to customers, and
  - d) Energy conservation by a team for their barrier line.
- 2) Improved decision making through the use of an Environmental Management System and documented by the cost accounting system.

With this letter, you are authorized to use the Green Tier Program logo on written materials that are related to your facility. Attached to this Acceptance Letter is a unique certificate that recognizes you for participating in the Green Tier Program. The DNR will work with you to annually celebrate your participation in the Green Tier Program through a joint press release to local newspapers and will maintain your company's name on a list of participants that is available on the DNR's website.

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

Federal Foam Technologies has satisfied the terms of the Environmental Management System requirement by having an ISO 14000 certified EMS. As a result, you are entitled to the lowest inspection frequency. We appreciate the time and effort that you have put into the development of the EMS and would ask that you let us know if you decide not to continue certification so that we can discuss what is needed to remain functionally equivalent to ISO 14000 as defined for Green Tier Participants.

You are also asked to update the DNR annually on your consultation with interested persons in the area. You are also asked to update the DNR annually on your progress in meeting your objectives and targets and implementing your EMS. Both of these requirements can be incorporated into your annual report to the DNR on your environmental performance accomplishments, and any EMS non-conformances or violations. Please also provide the DNR with documentation of your management review of your environmental management system at that time.

We would encourage you, as part of your annual report, to prepare an executive summary of your accomplishments over the last year that can be placed on the DNR's web site, and which could also be posted on Federal Foam's web site.

As a reminder, by the third year of your participation in the Green Tier program you must have your EMS audited by an outside environmental auditor. This requirement will be satisfied by the ISO 14000 certification.

We also ask that you use the attached list of indicators to gather information on the overall success of the Green Tier program. The information that you gather on the broad indicators is designed to supplement any measures that you gather to demonstrate the effectiveness of your EMS.

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

UPDATE: John Stoffel is Federal Foam's SPOC.  
Phone: 715-684-2914 ext. 121 Email: [John.Stoffel@wisconsin.gov](mailto:John.Stoffel@wisconsin.gov)

Your acceptance into the Green Tier Program is good for 5 years, and your status as a Green Tier company can be extended for additional amounts that we mutually agree to. You may withdraw from the program at any time by notifying us of your decision to withdraw. We may also withdraw you from the program if we believe that it is in the best interest of the Green Tier Program to end the relationship that is created with this letter.

I want to welcome you as a Tier 1 company and encourage you to work towards Tier II status in the future.

Sincerely,

/s/ Scott Hassett

Scott Hassett, Secretary  
WI Department of Natural Resources

Attachment: Tier 1 Application  
Certificate of Recognition  
Environmental Results Program Logo  
Generic Suite of Green Tier Indicators

**The following Indicators are proposed for all Green Tier participants. In addition to this Generic List, it is expected that other indicators/metrics will come out of your Environmental Management System and would be used to document accomplishments. This Generic List is meant to help Federal Foam Technologies, Inc. and the DNR document the relative success of the program.**

## **Environmental Indicators**

Some of the environmental indicators are already provided to the DNR. You would not be asked to report this information again if you have already reported it.

### **1.1 Water**

- 1.1.1 Total water use
- 1.1.2 Total amount of phosphorous released into water
- 1.1.3 Total waste water produced

### **1.2 Air Emissions**

- 1.2.1 Total greenhouse gas emissions
- 1.2.2 Total emissions of ozone-depleting substances
- 1.2.3 Total air emissions

### **1.3 Waste**

- 1.3.1 Total solid waste produced
- 1.3.2 Total percentage of material ending up as waste
- 1.3.3 Amount/percentage of waste that is hazardous
- 1.3.4 Amount of mercury lost or released into the environment
- 1.3.5 Amount/percentage of waste recycled

### **1.4 Energy**

- 1.4.1 Total energy used, listed by source
- 1.4.2 Amount/percentage of energy from renewable resources

### **1.5 Transportation**

- 1.5.1 Total fuel consumption
- 1.5.2 Amount/percentage of vehicles using alternative fuels

### **1.6 Spills**

- 1.6.1 Number of spills
- 1.6.2 Total amount of hazardous substances released due to spills

### **1.7 Land Use**

- 1.7.1 Total amount of land owned and percentage that is permeable (not paved or covered)

### **1.8 TRI**

- 1.8.1 Total TRI emissions

## **Economic Metrics**

- 2.1 Total sales – revenue brought in from annual sales before subtracting any costs.
- 2.2 Profit or loss – Quantify the profit or loss during the most recent fiscal year
- 2.3 Workforce changes – number of people employed, and the change over the previous year (using Jan 31 as the baseline date)



## **Social Metrics**

- 3.1 Amount provided to support alternative transportation options for employees
- 3.2 Income inequality – the multiple between lowest paid employee and highest paid employee
- 3.3 Percent of purchases made from companies in the state