



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Matthew J. Frank, Secretary

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October 9, 2009

Wade Cullen, Plant Manager
Phillips Plastics Corporation Magnesium Injection Molding
2930 Mondovi Road
Eau Claire, WI 54701

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Mr. Cullen:

Congratulations! The Wisconsin Department of Natural Resources (DNR) is pleased to approve your application and accept you into Green Tier. This letter of acceptance recognizes the value of Phillips Plastic Corporation – Magnesium Injection Molding accomplishments to date. You have proposed future projects and goals in your application (see attached) which continue to demonstrate your commitment to superior environmental performance.

By entering the Green Tier Program, and through your commitment to an Environmental Management System (EMS), you will systematically identify opportunities for environmental improvement. You have said your EMS will help the facility and its people identify and advance their efforts to improve environmental performance in waste reduction, recycling, energy use and your people involvement process. The Department recognizes that you have fulfilled the requirement of implementing an EMS equivalent to the ISO 14001 requirements and congratulate you on your decision to pursue ISO certification in 2009. 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 DNR. Should circumstances arise that may prevent the fulfillment of these commitments, please notify us.

As a part of your commitments, you have agreed to submit to the DNR an annual report regarding your participation in the program. These reports should document your current EMS objectives and targets, as well as discuss any measured progress made toward those goals stated in your application. You should also present the results of your annual EMS audit, describing any non-conformances discovered and identifying actions taken or proposed to correct them. Your first report should be submitted by March 18, 2010 and annually thereafter.

We also ask that you consider addressing the attached list of generic environmental indicators in your annual report. This additional reporting is voluntary, but it can help to quantify your successes beyond those explicitly outlined in your application or EMS. This information will also help document the overall success of the Green Tier program. If needed, the department will work with you to identify those indicators most relevant to your operations and critical to documenting program results.

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 collaborate with stakeholders in the development of your objectives and targets. The department can provide assistance in forming such a group should you require it. We also ask that you describe this and other communications with concerned entities in your annual report.

In recognition of Phillips Plastics' status as a Green Tier participant, you are entitled to Deferred Civil Enforcement as described in Wisconsin Statute section 299.83(6m)(d). In brief, if you discover a violation of an existing environmental requirement, immediately provide us notice of your discovery along with a corrective action plan and a schedule for bringing Phillips Plastics Corporation Magnesium Injection Molding back into compliance. DNR will not seek to impose penalties on you for the violation provided you successfully implement 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 guidelines provided for further information regarding the use of the logo. The department has committed to annually celebrate your participation in the program through a press release, and will publicize Phillips Plastics Corporation Magnesium Injection Molding as a Green Tier participant on the DNR website.

Finally, ~~Mark Harings~~ has been assigned as your single point of contact. ~~He can be reached at 715-831-3263 or at Mark.Harings@wisconsin.gov.~~ Please contact ~~Mark~~ with any questions concerning communications with the department, approvals you may be required to obtain, or for any technical assistance you need. UPDATE: Gina Keenan is Phillips-Medisize's SPOC.

Phone: 715-839-3765 Email: Gina.Keenan@wisconsin.gov

I want to welcome you as a Tier 1 participant in Green Tier and know that we stand ready to work with you on a Tier 2 contract in the future.

Sincerely,

/s/ Matthew Frank

Matthew J. Frank, Secretary
Wisconsin Department of Natural Resources

Attachment: Tier 1 Application
Generic Suite of Environmental Indicators
Green Tier Logo Files and Guidance CD

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 Phillips Plastics Corporation – Magnesium Injection Molding and 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)
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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