

Kimberly-Clark Experimental Mill Attachment 3

Proof of Functionally Equivalent EMS

At the request of the WDNR, the Experimental Mill (X-Mill) was directed not to provide documentation of functional equivalency as part of our notice of intent and application into the Green Tier program as a Tier 2 Participant, pending negotiation of our Tier 2 contract.

Experimental Mill (X-Mill) Environmental Policy Statement

It is the policy of the X-Mill to promote, support and continuously improve Environmental, Health, Safety and Quality programs and to manage them in a manner that seeks to eliminate loss to People, Equipment, Material, and Environment.

The X-Mill is committed to this policy by:

- Complying with relevant environmental, health, and safety, (EH&S) laws, regulations, and corporate policies.
- Preventing pollution and other negative impacts to property and the natural environment. Providing products and services which meet or exceed customer expectations for quality, performance, and value.
- Continuous improvement of EH&S performance by actively identifying and reducing hazards, risks, and variability.
- Educating employees on EH&S principles including how to identify and reduce job-associated hazards, risks, and variability.

Objectives and Targets

- Maintain current levels of environmental protection and regulatory compliance
 - Timely submittal of required annual reports
 - Commitment to training employees on their roles to assist in maintaining a facility that is environmentally compliant
 - Continued compliance with applicable permit/procedure requirements
 - As the X-Mill does not exceed permissible air emission levels, an annual air emissions inventory is conducted to ensure continued compliance
- Continue exploring the option of directly connecting the discharge of leachate water collected from the off-site Shady Lane landfill area (located in the Town of Menasha – currently owned by the Experimental Mill) to the Town of Menasha sanitary sewer system; thereby reducing the energy utilized to pump and transport the leachate off-site.
- Continuing commitment to advancing groundwater remediation:
 - Hired an outside contractor, AECOM, to review historical and current site data to develop a conceptual site model (CSM) for the property which describes historical site usage and potential sources of on-site and

off-site sources of contamination. AECOM and the X-Mill are currently discussing the 2008 CSM follow-up approach to determine the extent and degree of potential and existing source areas. The results of the investigation will provide recommendations to enhance reduction of potential sources contributing to the existing groundwater contaminant plume, which is being treated in the current ground water remediation system.

- Additionally, AECOM determined that the on-site remediation system, in its current operating configuration, could be modified such that the carbon drums and sediment filters could be bypassed and the extracted groundwater could be discharged directly into the City of Neenah municipal sewerage system. Once implemented, the modifications will reduce the amount of waste produced (spent sediment filters) and allow for more consistent operation of the treatment system.