State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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10/16/15

Tiffany Martin, Environmental Team Leader
Badger Mining Corporation – Alma Center Plant
409 S. Church Street
Berlin, WI 54923

Subject: Welcome to Green Tier – Tier 1

Dear Ms. Martin,

Congratulations! We are glad to welcome Badger Mining Corporation's fourth facility into Tier 1 of Green Tier. Badger Mining - Alma Center Plant now joins a group of companies who are not only committed to superior environmental performance but also to superior economic performance.

In recognizing your past accomplishments and future commitments we promise to work towards promoting and recognizing your facility for taking the lead in environmental protection while assuring economic stability and growth. We are committed to publicizing Badger Mining Corporation – Alma Center Plant.

Badger Mining Corporation – Alma Center Plant will be listed as a Green Tier participant on the DNR website. Undoubtedly, there will be other opportunities to bring attention to your accomplishments, and we hope to assist you in doing so as a Green Tier partner.

John Stoffel has been assigned as your single points of contact. John can be reached at (715) 684-2914 X 121 or at john.stoffel@Wisconsin.gov. Please contact him with any questions concerning communications, required approvals, or technical assistance you may need. For your convenience the attached Commitment Outline points out your benefits and important dates that affect your participation.

On behalf of the Wisconsin Department of Natural Resources, I am proud to extend this welcome to you. We are committed to working with you to build a customized relationship under the Green Tier program. I am excited to embark on our new relationship and my staff is ready to assist as your business grows.

Sincerely,

/s/ Cathy Stepp

Cathy Stepp
Secretary

Cc: Roberta Walls, Project Coordinator
John Stoffel, SPOC

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

Green Tier Commitment Outline for
Badger Mining Corporation – Alma Center Plant

I. Approval Date – 10/16/2015

II. Green Tier - Tier 1

- **Deferred Civil Action:** You are entitled to Deferred Civil Enforcement as described in statutes (299.83(6m)(d)). In brief, if you discover a violation of an existing environmental requirement, provide us notice of your discovery and a corrective action plan and documentation of your EMS changes that ensure the violation will not happen again, you are entitled to protection from any civil penalties that the DNR might otherwise impose.
- **Green Tier Logo**: You can use the Green Tier logo on materials related to your facility. The CD provided in your packet provides additional guidelines and information.
- **Single Point of Contact (SPOC)**: John Stoffel - DNR, (715) 684-2914 X121, John.Stoffel@Wisconsin.gov
  You should also feel free to call Roberta Walls, Project Coordinator, (608) 785-9272, Roberta.Walls@Wisconsin.gov for any additional information that you might need.
- **Minimum Inspection Frequency:** Because you have implemented an EMS you are entitled to inspections at the lowest frequency permitted by the programs under law. We will work with you to determine how this will work for you.
- **Recognition:** Along with the numbered certificate of recognition, the department will host a participant web page for easy reference.

III. Environmental Management Systems (EMS)

- You have agreed to have your EMS in place on or before 10/16/2016. At least one time prior to **10/16/2016** and every year after that, perform an environmental management system audit. Every third year this audit must be done by an outside environmental auditor approved by the Department or certified by RABQSA. Your first external audit should be completed on or before 10/16/2018. For a list of auditors see: http://dnr.wi.gov/topic/GreenTier/Auditors.html

IV. Annual Reporting

- **Reporting on Environmental Performance Commitments:** Your first annual report should provide data on your progress toward meeting your ongoing environmental performance commitments laid out in your Green Tier application. You identified the following:
  - Monitor the regulatory landscape and take appropriate steps to exceed environmental, health, and safety requirements.
  - Focus on energy conservation, sustainable water resources management, air quality, waste reduction, health and safety.
  - Integrate responsible natural resource management planning and stewardship activities.
  - Educate stakeholders regarding environmentally responsible mining, including processing and reclamation.
  - Empower associates to promote environmental stewardship.

- **First Annual Report Due Date -** By mutual agreement we have agreed to April 1, 2017 and annually thereafter. (Please feel free to discuss alternative reporting dates with Roberta Walls (608) 785-9272, Roberta.Walls@Wisconsin.gov should your needs change.)
- Annually you will need to report progress on the commitments that you have made. You will need to report your progress on the specific commitments and information which will give us context for those commitments. If you have a goal to reduce energy consumption, then the context would be total energy consumed. We will work with you to find the context reporting that will work best for you. For more details about annual reports and a metrics reporting spreadsheet see:
  http://dnr.wi.gov/files/PDF/pubs/co/CO521.pdf
  http://dnr.wi.gov/topic/GreenTier/documents/SustainabilityMetricsSpreadsheet.xlsx
- Please provide annual Green Tier Reports to both this email address: GreenTier@Wisconsin.gov and to your SPOC, John.Stoffel@Wisconsin.gov Electronic submission is preferable.