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**State of Wisconsin**  
**DEPARTMENT OF NATURAL RESOURCES**  
101 S. Webster Street  
Box 7921  
Madison WI 53707-7921

Scott Walker, Governor  
Cathy Stepp, Secretary  
Telephone 608-266-2621  
FAX 608-267-3579  
TTY Access via relay - 711



December 15, 2011

Phillip A. Purpero  
C.W. Purpero  
1190 West Rawson Avenue  
Oak Creek, WI 53154

Subject: Welcome to Green Tier

Dear Mr. Purpero:

Congratulations! We are glad to welcome you into Green Tier. You join 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 C.W. Purpero as a Green Tier participant on the DNR website. Undoubtedly, there will be other opportunities to focus on your accomplishments, and we offer you our assistance as a Green Tier partner.

Craig Webster has been assigned as your single point of contact. He can be reached at 262-574-2141 or at [craig.webster@wisconsin.gov](mailto:craig.webster@wisconsin.gov). Please contact Craig with any questions concerning communications, required approvals, or technical assistance you may need. For your convenience the attached guidance outlines 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

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

**Green Tier Commitment Outline for  
C.W. Purpero, Inc.**

**Approval Date – December 15, 2011**

Commitment Outline Updated: February 6, 2020

The updates since participation started are:

- 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/C0503.pdf>

You have agreed to implement your EMS on or before **January 1, 2013**.

Within 30 days please email your EMS implementation date to:

[GreenTier@Wisconsin.gov](mailto:GreenTier@Wisconsin.gov), your Project Coordinator,

[William.Erikson@Wisconsin.gov](mailto:William.Erikson@Wisconsin.gov) and your Single Point of Contact (SPOC),

[Craig.Webster@Wisconsin.gov](mailto:Craig.Webster@Wisconsin.gov).

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **January 1, 2013** and every year after that, perform an environmental management system audit. The department recommends that your first audit 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>
- B. On or before, **January 1, 2015** and every third year, this audit **must** be completed by a DNR-approved outside EMS auditor.

**II. Provide an Annual Report**

- A. **Annual Report Due Date** - We have mutually agreed that the deadline for your Green Tier annual report is **June 30, 2013** and annually thereafter. (Please feel free to discuss alternative reporting dates with your Project Coordinator, [William.Erikson@Wisconsin.gov](mailto:William.Erikson@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 provide annual Green Tier Reports to both of these email addresses: [GreenTier@Wisconsin.gov](mailto:GreenTier@Wisconsin.gov) and to your Single Point of Contact, [Craig.Webster@Wisconsin.gov](mailto:Craig.Webster@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: Craig Webster - DNR, Phone 262-574-2141, Cell 414-303-3011, [Craig.Webster@Wisconsin.gov](mailto:Craig.Webster@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: Will Erikson, Phone 608-267-3763, Cell 608-215-3930, [William.Erikson@Wisconsin.gov](mailto:William.Erikson@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 Phillip A. Purpero, P.E.	Title President		
Street Address 1190 West Rawson Avenue	City Oak Creek	State WI	ZIP Code 53154
Telephone Number 414-856-2850	Fax Number 414-856-2856	E-mail Address pap@purpero.com	

## II. Facility Information

Facility Name C.W. Purpero, Inc	County Milwaukee		
Street Address 1190 West Rawson Avenue	City Oak Creek	State WI	ZIP Code 53154
Mailing Address 1190 West Rawson Avenue	City Oak Creek	State WI	ZIP Code 53154

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 (circle one)
- b. Have you implemented an EMS that is functionally equivalent to ISO 14001?      Yes      No (circle 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 Notice/Stakeholder Identification

Please provide in a separate document labeled **Attachment 4** a list of stakeholders whom you know or expect will have a strong interest in your Green Tier application, as well as contact information for those stakeholders. This information will help DNR expedite the processing of your application. Tier 2 applicants must provide additional information about stakeholder 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.

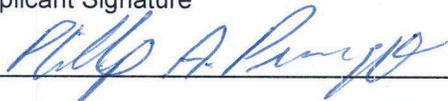
## VIII. Tier 1 Applicant Statement of Commitments

**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 3<sup>rd</sup> 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



3/28/2011

## 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

## X. For Department Use Only

Date Received	Initials of Reviewer	Status	Date Returned to Applicant for Additional Information	Date Denied	Date Approved

## **Attachment 1**

*C.W. Purpero, Inc.*

*Scope of activities and facilities to be covered*

### Facilities:

- Office Building and property at 1190 West Rawson Avenue, Oak Creek, WI 53154
- Shop Building and Property at 5770 South 13<sup>th</sup> Street, Milwaukee, WI 53221
- Multiple Projects Sites – Listed under Activities

### Equipment:

- Emission reduction for Heavy Equipment, owned by C.W. Purpero, Inc., used on projects in Wisconsin.

### Activities

- Earthwork and Demolition activities on projects in Wisconsin as they relate to:
  - Storm Water Management / Erosion Control
  - Recycling and reuse of construction materials
- Beneficial reuse of industrial waste (NR 538) from third party generators

## **Attachment 2**

*C.W. Purpero, Inc.*

**Past and current environmental performance with respect to each covered facility or activity**

### Facilities:

- Office Building and property at 1190 West Rawson Avenue, Oak Creek, WI 53154
  - Replacement of Neon Building sign with LED sign
- Shop Building and Property at 5770 South 13<sup>th</sup> Street, Milwaukee, WI 53221
  - Recycling of waste oils

### Equipment:

- Emission reduction for Heavy Equipment, owned by C.W. Purpero, Inc., used on projects in Wisconsin.
  - While routine replacement of old equipment naturally upgrades the overall average equipment fleet emission rating, this average is further upgraded through the use of scrubbers on additional older pieces of heavy equipment.

### Activities:

- Recycling construction materials in our earthwork and demolition operations on multiple projects:
  - Removals of structural concrete and flat concrete on projects and sized for either on site crushing or hauling off site for crushing.
    - When off site processing is required, often round robin trucking is used as much as possible (loaded both ways), raw materials out, processed materials back to project site.
    - Reinforcing steel salvaged as discussed below.
  - Removals of bituminous pavement materials on projects and salvaged for re-use:
    - Pulverized in place and relocated thereafter on site for reuse
    - Broken as removed, stockpiled, then crushed for reuse
    - Broken as removed, exported, processed, and imported using round robin trucking when possible
  - Metal building materials are salvaged:
    - Structural steel – from building frame demolition
    - Metal decking – from mezzanines and roofing elements
    - Reinforcing steel – from structural concrete
    - Copper wiring – from communication and power wiring
    - Corrugated steel – from steel siding, corrugated metal piping,
    - Steel tanks – from underground buried tanks once cleaned
- Beneficial reuse of Industrial waste products as per NR 538:
  - Identify uses on construction projects
  - Assistance in the education of the industry on behalf of the WDNR and local generators of industrial waste.

- Assistance in the production of informational media developed by generators to educate industry on past success implementing NR 538 for the beneficial reuse of their waste products.
  - Individual office visits to local engineering consultants in an effort to further familiarize them with NR 538 and how it might apply to projects they design and / or inspect.
  - Participation as a panelist in local NR 538 workshops put on by the WDNR.
- Fly ash
  - Used at lower percentages for moisture reduction in engineered soils
  - Used at higher percentages for soil modification (chemical reaction) to “set up” subgrade surfaces
- Kiln dust
  - Used at lower percentages for moisture reduction in engineered clay based soils
  - Used to stabilize sludge on environmental projects
- Foundry Sand
  - Used for some types of foundation backfill
  - Used for some types of utility pipe backfill
  - Used as general structural fill for paved areas
- Storm Water Management / Erosion control
  - Consistent practice to go beyond compliance by developing superior approaches, maintaining effective communication with all parties, and job site diligence.

## Attachment 2 (continued)

*C.W. Purpero, Inc.*

Future plans for enhancing the environment with respect to the same facilities or activities

### Facilities:

- Office Building and property at 1190 West Rawson Avenue, Oak Creek, WI 53154
  - Decrease water use – toilets, urinals,
  - Decrease power use – WE Energies help, IT equipment...
  - Decrease waste – paper, bathroom waste,
- Shop Building and Property at 5770 South 13<sup>th</sup> Street, Milwaukee, WI 53221
  - Decrease waste
  - Increase recycling

### Equipment:

- For Heavy Equipment, owned by C.W. Purpero, Inc.:
  - Increase the integration of emission rating into equipment replacement decisions
  - Increase the weight of the fuel efficiency factor in equipment replacement decisions
  - Look at ways to further focus on the fuel burn factor in equipment combinations for common equipment intensive activities
  - Explore ways to invest in technologies that save fuel and reduce emissions over the life of the equipment

### Activities:

- Recycling construction materials: Identify additional reuses of construction waste:
  - Establish better ways to track waste recycling quantities and / or percentages in order to set goals for improvement and to bid more competitively.
  - Expand our network of recycling partners.
  - Place a heavier emphasis on recycling equipment in our equipment replacement / investment decisions.
- Beneficial reuse of industrial waste: Identify additional reuses of waste:
  - Continue to Identify additional uses on own construction projects and projects in addition to ours possibly as a broker for generators.
  - Increase in the production of informational media to educate industry on implementing NR 538 for the beneficial reuse of waste products.
- Storm Water Management / Erosion control
  - Further improve project performance:
    - As a prime contractor –
      - look at the best of our past performances to identify the reasons for success and make them part of our standard process for planning for and running projects
    - As a subcontractor –

- Propose contract attachments with language that serves to offer our expertise to protect their interest in exchange for the authority to do so, as well as a mechanism to pay for it.