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## Green Tier Commitment Outline for Holsum Dairies – Elm Dairy

Approval Date – June 18, 2009

Commitment Outline Updated: 2-10-2020

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 supplied us with a copy of your ISO 14001 certification, satisfying initial Green Tier EMS requirements.

To maintain good standing with Green Tier EMS requirements:

- A. On or before, **June 18, 2010** and every year after that, you must perform an environmental management system audit. The department recommends that your first audit be completed by a DNR-approved outside environmental auditor.
- B. On or before, **June 18, 2012** and every third year, this audit **must** 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>

### 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, 2010** (*before 2016 was March 15*), 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 submit Green Tier Annual Reports 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), [Benjamin.Uvaas@Wisconsin.gov](mailto:Benjamin.Uvaas@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: Benjamin Uvaas - DNR, Phone 920-303-5433, Cell 920-273-5543, [Benjamin.Uvaas@Wisconsin.gov](mailto:Benjamin.Uvaas@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



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Matthew J. Frank, Secretary

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

Kenn Buelow  
Holsum Dairies LLC  
N6206 Elm Rd  
Hilbert, WI 54129

June 18, 2009

Subject: Green Tier Acceptance Letter for Tier 1

Dear Mr. Buelow:

Congratulations! The Wisconsin Department of Natural Resources (DNR) is pleased to approve your application and welcome Holsum Dairy's Elm Dairy into the Green Tier Program. This letter of acceptance recognizes the value of Holsum Dairy's environmental initiatives and your 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.

Holsum Dairy has committed to superior environmental performance both at the Irish Dairy and now at the Elm Dairy. Holsum Dairy has acted aggressively on several fronts to optimize their systems approach to milk production. You have made great strides in turning waste into resources, creating bedding material from the solids component of the manure and electricity from the gaseous component. In short, you have demonstrated environmental sensitivity and environmental leadership. If future circumstances impede your sustained commitment to these practices, please notify us.

In addition to your broader efforts described above, you have also agreed to implement the following measures toward superior environmental performance.

- Continue to set environmental objectives and targets
- Reduce energy consumption by extracting heat from the manure digesting process
- Reduce the need to harvest and transport straw
- Minimize transportation fuel use by keeping calves on site
- Replace the milk pasteurizer with acidified milk for calves, thereby saving the energy required to pasteurize milk
- Implement an additional manure separation process to further reduce the phosphorus concentrations in liquid manure applied to fields
- Purchase center pivot irrigation systems that will distribute low phosphorus liquid manure directly to growing crops.

I congratulate you on thinking about the dairy business as a system, and finding ways to reuse, or turn into raw materials, what others are treating as waste.

In addition, since you have documented your Environmental Management System as functionally equivalent to an ISO 14001 system, the DNR commits to inspect Holsum Dairy at the lowest frequency permitted by law, unless the DNR believes you to be out of compliance.

The Green Tier statute requires that you perform an annual audit of your EMS, with every third audit performed by an outside environmental auditor approved by the department. Should circumstances arise that delay 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 about your participation in the program. These reports should provide an update of your current objectives and targets, as well as discuss any measured progress made toward the commitments you made 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 to Mark McDermid with a copy to your single point of contact by March 15, 2010, and annually thereafter

We also ask that you address the attached list of generic environmental indicators in your annual report, especially those related to Holsum Dairy's identified objectives and targets. This additional reporting is completely 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 successes of the Green Tier program.

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 a violation with an existing environmental requirement, and if you provide us notice of your discovery along with a corrective action plan and timeline 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 Holsum Dairy for the 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.

This letter authorizes Holsum Dairy 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 Holsum Dairy as a Green Tier participant on the DNR website.

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 use stakeholders in the development of objectives and targets. We also ask that you describe this and other communications with concerned entities in your annual report.

Finally, if you have any questions about your interaction as a Tier 1 participant with the DNR, Amy Callis has been assigned as your single point of contact. Please coordinate with Amy 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.

I want to welcome you as a Tier 1 company and encourage you to work towards Tier 2 status in the future.

Sincerely,

/s/ Matt Frank

Matt Frank, Secretary  
WI Department of Natural Resources

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

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	Holsum Dairies, LLC, Kenn Buelow			Title	Manager				
Street Address	N 5701 Irish Rd.			City	Hilbert	State	WI	ZIP Code	54129
Telephone Number	920 849 1133			Fax Number	920 849 3030			E-mail Address	irishdairy@ppcws.net

## II. Facility Information

Facility Name	Holsum Irish Dairy			County	Calumet				
Street Address	N 5701 Irish Rd.			City	Hilbert	State	WI	ZIP Code	54129
Mailing Address	N 5701 Irish Rd.			City	Hilbert	State	WI	ZIP Code	54129

Please provide all DNR Facility Identification numbers (FID #) that apply to the covered facility or activity.

F.I.D. # 16454

## III. Scope of Green Tier Participation (check one) *This is an amendment to the 12/7/04 application*

- 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 6/13/08
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## 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
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X. For Department Use Only					
Date Received	Initials of Reviewer	Status	Date Returned to Applicant for Additional Information	Date Denied	Date Approved

**Attachment 1, Green Tier Amendment Application 2008**

**II. Facility Information**

Facility Name:

**Holsum Elm Dairy**

County:

**Calumet**

Street Address City State ZIP Code:

**N6206 Elm Rd., Hilbert, WI 54129**

Mailing Address City State ZIP Code:

**N6206 Elm Rd., Hilbert, WI 54129**

FID #

**33696**

## Attachment 2, Green Tier Amendment Application 2008

### 1-narrative paragraph(s) of Elm Dairy's history of environmental performance:

Holsum Elm Dairy, from its inception, has been assisted in outstanding environmental performance by the example of Green Tier qualified Holsum Irish Dairy. Not an identical twin, Elm Dairy had the advantage of five years of practical experience from Irish Dairy. What worked was retained and what could be enhanced was upgraded. From cow comfort stalls and ventilation to manure pond configuration to facility lighting and stormwater routing, countless improvements were incorporated.

The physical plant hub is located at a greater distance from the nearest neighbor, reducing operating sounds, light and traffic noise. New technical developments contributed to improved manure-to-electricity generating capability and a more energy efficient rotary milking parlor. Elm Dairy joins Irish Dairy in surpassing Wisconsin's environmental requirements. The two dairies together passed a three day rigorous environmental audit by the professionals of Environmental Compliance Systems, Inc. in September 2007.

None of this would have been possible without the pride and expertise of the people involved: the contractors, our construction crew, and Irish Dairy's motivated staff (who either transferred to Elm or trained newly hired employees to Irish Dairy's same high standards).

### 2- narrative paragraph(s) of Elm Dairy's future environmental performance:

Elm and Irish Dairies will continue to minimize their effects on air, water, land, and natural resources, as we produce high quality milk. We will strive for reducing waste, recycling raw materials, reusing water, and investigating novel applications of technology.

In 2008, we will we will build an innovative calf raising facility on Elm Dairy's land, that groups calves with 7 to 11 herd mates. To conserve resources, the facility will utilize in floor heat harvested from the manure digester, will not require straw, and will use acidified milk rather than a pasteurizer. As envisioned, it will eliminate the fossil fuels needed to transport calves off site, to harvest and transport straw bedding, and to heat the milk pasteurizer. Less travel, controlled environment, and pathogen free milk are also likely to benefit the calves' health.

In 2008, we are considering an additional manure separation process to extract even more phosphorus. We have been working with three engineering firms for 2-1/2 years on this project. If successful, we will purchase several center pivot irrigation systems to be used with the guidance of agronomy consultants. We envision irrigating (watering) the filtrate, with its reduced phosphorus, onto parched crops at critical times, assuring plant uptake of the remaining fertilizing nutrients and higher yielding crops.

**Attachment 3, Green Tier Amendment Application 2008**

Complete functional equivalency file is available at:

<http://dhr.wi.gov/org/caer/ceal/environmental/participants/holsum/index.htm>

Also, our Green Tier Certificate of conformance is included herein:

