

Table of Contents

Commitment outline

Acceptance letter

Application

Attachment 1

Attachment 2

**Green Tier Commitment Outline for
Wisconsin Department of Military Affairs
85 facilities state-wide**

Approval Date – December 28, 2010

Commitment Outline Updated: 02-06-2020

The updates since participation started are:

- Change of SPOC
- Change of project coordinator
- Change of annual report due date
- 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/CO503.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, **December 28, 2011** 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, **December 28, 2013** 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 **Feb 1st** and annually thereafter. (Please feel free to discuss alternative reporting dates with your Project Coordinator, JenniferA.Birkholz@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 and to your Single Point of Contact, Jared.Seidl@Wisconsin.gov.

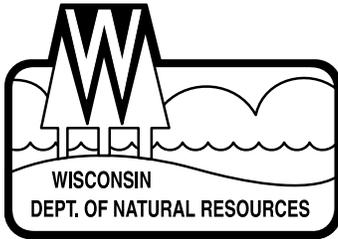
III. Work toward Superior Environmental Performance

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: Jared Seidl, Phone: 920-303-5423, Jared.Seidl@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: Jenni Birkholz, Phone 608-226-8226, Cell 608-514-2182, JenniferA.Birkholz@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

December 28, 2010

Wisconsin Department of Military Affairs
Cpt. Nathan Olson
2400 Wright Street
Madison, WI 53704-2572

Subject: Acceptance Letter for Tier 1 of Green Tier

Dear Captain Olson:

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 Wisconsin Department of Military Affairs (WIARNG) 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. Your team will identify aspects and set targets for reduced water, electricity, and natural gas consumption, as well as hazardous material disposal and deployment related challenges. Your EMS which evolved from your EPAS program is a robust and comprehensive program. We look forward to working with you on continual improvements for positive WIARNG and environmental outcomes.

By December 28, 2011, your EMS should either be certified to the ISO 14001 standard or documented as functionally equivalent (see attached guidance). You are reminded to 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 DNR an annual report regarding your participation in the program. These reports should document your current objectives and targets, as well as discuss any measured progress made toward those goals stated in this letter and your EMS. 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 December 28, 2011 and annually thereafter. If you desire a different reporting period to more closely align with other reports that you prepare, thereby reducing administrative overhead, please contact your SPOC to arrange for that modification.

We also ask that you consider addressing the attached list of generic environmental indicators in your annual report, especially those related to WIARNG identified objectives and targets. This additional reporting is strongly encouraged, and it can help to quantify your successes beyond those explicitly outlined in this letter 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 WIARNG 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 WIARNG 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 facilities listed in your application (85 total). 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 WIARNG as a Green Tier participant on the DNR website.

Finally, Gregg Breese has been assigned as your single point of contact. He can be reached at 608-267-7407 or at Gregory.breese@wisconsin.gov. Please contact Gregg with any questions concerning communications with the department, approvals you may be required to obtain, or for any technical assistance you need.

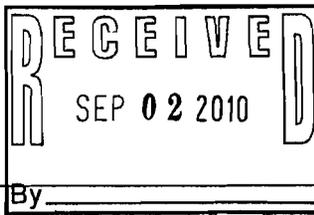
I want to welcome you as a Tier 1 participant. As our working relationship evolves and specific environmental and business opportunities arise, please know the Green Tier program is prepared to help develop a customized working relationship with WIARNG under the terms and conditions of Tier 2.

Sincerely,

/s/ Matthew Frank

Matthew J. Frank, Secretary
Wisconsin Department of Natural Resources

Attachments: Green Tier Logo Files and Guidance CD



Green Tier Application

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 CPT Nathan Olson	Title Environmental Program Manager		
Street Address 2400 Wright Street	City Madison	State WI	ZIP Code 53704-2572
Telephone Number (608) 242-3364	Fax Number (608) 242-3371	E-mail Address nathan.olson@wisconsin.gov	

II. Facility Information

Facility Name Wisconsin Department of Military Affairs	County Dane		
Street Address 2400 Wright Street	City Madison	State WI	ZIP Code 53704-2572
Mailing Address	City	State	ZIP Code

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

(See Attachment 1)

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.

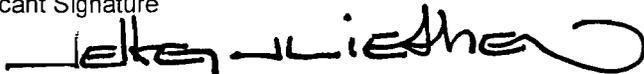
If a waiver is requested, please provide information describing any requirements not met and a justification for the waiver request on a separate page labeled **Attachment 5**. Note that waivers will be granted only in exceptional circumstances.

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 3rd 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

31 Aug 10

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

Wisconsin Army National Guard Facility List

Attachment #1

WIARNG Facility List for Green Tier Application

	Facility	Address	County	WIDNR Facility ID #
1	Abbotsford	1001 E Elm, Box 508 Abbotsford, WI 54405-0508	Marathon Co.	
2	Antigo	720 Amron Ave Antigo, WI 54409-2905	Langlade Co.	
3	Appleton	2801 W. Second St. Appleton, WI 54914	Outagamie	
4	Arcadia	1350 E Wilson Ave Arcadia, WI 54612-1831	Trempealeau Co.	113197700
5	Ashland	420 Sanborn Ave Ashland, WI 54806-2450	Ashland Co.	
6	Baraboo	999 South Blvd Baraboo, WI 53913-3108	Sauk Co.	
7	Beloit	2700 Kennedy Dr Beloit, WI 53511-3966	Rock Co.	
8	Berlin	147 Memorial Dr Berlin, WI 54923-1203	Green Lake Co.	
9	Black River Falls	441 Hwy 54 West Black River Falls, WI 54615-9615	Jackson Co.	627046530
10	Burlington	240 S Wisconsin St Burlington, WI 53105-1553	Racine Co.	
11	Camp Williams 32nd BDE	Bldg 204 8 Madison Blvd Camp Douglas, WI 54618-5002	Juneau Co.	
12	Camp Williams CSMS	Bldg 50 8 Madison Blvd Camp Douglas, WI 54618-5002	Juneau Co.	729044250
13	Camp Williams USPFO	1 Williams St Camp Douglas, WI 54618-5002	Juneau Co.	729044470
14	Chippewa Falls	2811 E Park Ave Chippewa Falls, WI 54729-3506	Chippewa Co.	
15	Clintonville	201 Industrial Ct Clintonville, WI 54929-1126	Waupaca Co.	469088730
16	Eau Claire	1730 North Ln Eau Claire, WI 54703-0850	Eau Claire Co.	
17	Eau Claire FMS 7	1728 North Ln Eau Claire, WI 54703-0850	Eau Claire Co.	
18	Elkhorn	401 E Fair St Elkhorn, WI 53121-1938	Walworth Co.	265102970
19	Fond du Lac	796 Sullivan Dr Fond du Lac, WI 54935-9165	Fond du Lac Co.	
20	Fort Atkinson	420 Bark River Dr Fort Atkinson, WI 53538-2662	Jefferson Co.	
21	Fort McCoy MATES	242 East G St Fort McCoy, WI 54656-5225	Monroe Co.	642046020
22	Green Bay	800 N Military Ave Green Bay, WI 54303-4408	Brown Co.	405087430
23	Hartford	880 W State St Hartford, WI 53027-1064	Washington Co.	267097490
24	Hayward	10691 Main St Hayward, WI 54843-6595	Sawyer Co.	

Attachment #1

WIARNG Facility List for Green Tier Application

25	Hayward FMS 12	9745 N Boys Camp Rd Hayward, WI 54843-7837	Sawyer Co.	
26	Janesville	11 Palmer Dr Janesville, WI 53545-5253	Rock Co.	
27	Kenosha	4200 43rd Ave Kenosha, WI 53144-3423	Kenosha Co.	
28	Kenosha FMS 6	4200 43rd Ave Kenosha, WI 53144-3423	Kenosha Co.	
29	Madison 1420 Wright St.	1420 Wright St Madison, WI 53704-4125	Dane Co.	
30	Madison 147th Avn Bn	1954 Pearson St Madison, WI 53704-2517	Dane Co.	
31	Madison AASF 2	1950 Pearson St Madison, WI 53704-2517	Dane Co.	
32	Madison Bldg 901	2402 Bowman St Madison, WI 53704-2562	Dane Co.	
33	Madison FMS 9	1418 Wright St Madison, WI 53704-4125	Dane Co.	113149300
34	Madison JFHQ-WI	2400 Wright St PO Box 14587 Madison, WI 53708-0587	Dane Co.	113234990
35	Marinette	2000 Mary St PO Box 424 Marinette, WI 54143	Marinette Co.	
36	Marshfield	319 West 29th St Marshfield, WI 54449-5256	Wood Co.	
37	Mauston	919 Division St Mauston, WI 53948-9364	Juneau Co.	
38	Medford	630 Jensen Dr Medford, WI 54451-1665	Taylor Co.	
39	Menomonie	315 28th Avenue West Menomonie, WI 54751-5467	Dunn Co.	
40	Merrill	106 Memorial Dr Merrill, WI 54452-2738	Lincoln Co.	
41	Milwaukee	4108 N Richards St Milwaukee, WI 53212-1012	Milwaukee Co.	
42	Milwaukee FMS 3	4108 N Richards St Milwaukee, WI 53212-1012	Milwaukee Co.	241306450
43	Monroe	1130 30th Street Monroe, WI 53566-3355	Green Co.	
44	Mosinee	1000 Jackson St Mosinee, WI 54455-1351	Marathon Co.	
45	Neillsville	411 West 18th St Neillsville, WI 54456-1001	Clark Co.	113216070
46	New Richmond	1245 Wall St New Richmond, WI 54017-9615	St. Croix Co.	
47	Oak Creek	8520 S Howell Ave Oak Creek, WI 53154-2921	Milwaukee Co.	
48	Oconomowoc	1215 Wall St Oconomowoc, WI 53066-2662	Waukesha Co.	
49	Onalaska	910 Oak Forest Dr Onalaska, WI 54650-3498	LaCrosse Co.	

Attachment #1

WIARNG Facility List for Green Tier Application

50	Oshkosh	1415 Armory Place Oshkosh, WI 54901-6117	Winnebago Co.	
51	Oshkosh FMS 10	1550 Osborn Ave Oshkosh, WI 54901	Winnebago Co.	
52	Platteville	475 N Water St PO Box 107 Platteville, WI 53818-0107	Grant Co.	
53	Plymouth	625 Sunset Dr Plymouth, WI 53073-1099	Sheboygan Co.	
54	Portage	2425 W Wisconsin St Portage, WI 53901-1020	Columbia Co.	
55	Prairie du Chien	601 N Marquette Rd Rt 4, PO Box 690 Prairie du Chien, WI 53821-9804	Crawford Co.	612038680
56	Racine	700 24th St Racine, WI 53403-3375	Racine Co.	
57	Reedsburg	549 S Dewey Ave Reedsburg, WI 53959-2102	Sauk Co.	
58	Rhineland	1136 Military Rd Rhineland, WI 54501-3652	Oneida Co.	
59	Rice Lake	307 E Barker St Rice Lake, WI 54868-2625	Barron Co.	
60	Richland Center	1350 Peebles Dr Richland Center, WI 53581-2938	Richland Co.	
61	Ripon	707 E Fond du Lac St Ripon, WI 54971-9570	Fond du Lac Co.	
62	River Falls	815 W Division St River Falls, WI 54022-1216	St. Croix Co.	
63	Sparta	602 E Division St Sparta, WI 54656-1308	Monroe Co.	
64	Spoooner	624 E Maple St Rt 2 Spoooner, WI 54801-9468	Washburn Co.	
65	Stevens Point	3116 Jefferson St Stevens Point, WI 54481-4232	Portage Co.	
66	Superior	32 North 21st St Superior, WI 54880-5298	Douglas Co.	816072400
67	Sussex	W237 N5678 Maple Ave Sussex, WI 53089-3602	Waukesha Co.	
68	Sussex FMS 5	W237 N5678 Maple Ave Sussex, WI 53089-3602	Waukesha Co.	
69	Tomah	520 Mill St Tomah, WI 54660-1230	Monroe Co.	
70	Tomahawk	215 Armory Rd Tomahawk, WI 54487-1729	Lincoln Co.	
71	Two Rivers	2225 Sandy Bay Rd Two Rivers, WI 54241-3828	Manitowoc Co.	
72	Viroqua	600 Dyson St Viroqua, WI 54665-1219	Vernon Co.	
73	Watertown	1700 River Dr Watertown, WI 53094-7402	Jefferson Co.	

Attachment #1**WIARNG Facility List for Green Tier Application**

74	Waukesha	311 Walton Ave Waukesha, WI 53186-5905	Waukesha Co.	
75	Waupaca	1949 Spindt Dr Waupaca, WI 54981-8841	Waupaca Co.	
76	Waupun	315 N Grove St Waupun, WI 53963-1501	Fond du Lac Co.	
77	Wausau	833 S 17th Ave Wausau, WI 54401-5301	Marathon Co.	
78	Wausau FMS 13	833 S 17th Ave Wausau, WI 54401-5301	Marathon Co.	
79	West Bend	125 Chopper Dr West Bend, WI 53095-8968	Washington Co.	
80	West Bend AASF 1	105 Trenton Rd West Bend, WI 53095-8901	Washington Co.	
81	Whitewater	952 Universal Blvd Whitewater, WI 53190-1464	Walworth Co.	
82	Whitewater FMS 8	952 Universal Blvd Whitewater, WI 53190-1464	Walworth Co.	
83	Wisconsin Military Academy	Bldg 90, S 10th Ave Fort McCoy, WI 54656-5168	Monroe Co.	
84	Wisconsin Rapids	1710 Second Ave South Wisconsin Rapids, WI 54495	Wood Co.	
85	Wisconsin Rapids FMS 14	1841 Gaynor Ave Wisconsin Rapids, WI 54495	Wood Co.	

Attachment 2

Environmental Performance Statement

CORRESPONDENCE/MEMORANDUM



STATE OF WISCONSIN

DEPARTMENT OF MILITARY AFFAIRS
OFFICE OF THE ADJUTANT GENERAL
DIRECTORATE OF FACILITIES
2400 WRIGHT STREET
MADISON WI 53704-2572

DATE: July 14, 2010

TO: Wisconsin Department of Natural Resources, Director of Bureau of Cooperative Environmental Assistance, P.O. Box 7921, Madison, WI, 53707-7921

FROM: Department of Military Affairs, WIJS-J4-ENV, 2400 Wright Street, Madison, WI 53704-2572

SUBJECT: Attachment #2 of WIARNG Green Tier Application

The Wisconsin Army National Guard is a dynamic organization that continues to evolve to meet the changing needs in providing state and national security. Integral to its role in respective Wisconsin communities are its efforts toward environmental stewardship. An important goal is to lead the way in protecting and enhancing natural and cultural resources in Wisconsin while maintaining the highest degree of military readiness. To this end, the WIARNG strives to comply with all Federal, state, and local regulations, as well as Army Regulations, in working to preserve, protect, and restore the quality of the environment. In addition, the WIARNG has implemented many waste minimization and recycling activities as best management practices and hazardous waste reduction initiatives.

1. WIARNG Facility Operations

The Wisconsin Army National Guard (WIARNG) manages multiple facilities and equipment throughout Wisconsin. It manages surface maintenance facilities to include the Maneuver Area Training Equipment Sites (MATES), Combined Support Maintenance Shop (CSMS), ten (10) Field Maintenance Shops (FMSs), and two (2) Army Aviation Support Facilities (AASFs). In addition, WIARNG operates from and manages sixty-nine (69) Armories statewide, a United States Property and Fiscal Office (USPFO), a Joint Forces Headquarters (JFHQ) building, administration buildings and warehouse, the Wisconsin Military Academy (WMA) as well as training sites and local training areas (LTAs). The WIARNG operates multiple facilities throughout Wisconsin but manages operations and activities as one collective agency. The WIARNG facilities and their respective operations are discussed below.

Maneuver Area Training Equipment Site (MATES) (1 Facility)

The MATES is located at Ft. McCoy and provides permanent storage, service, hot water parts washing, maintenance, and repair of primarily large military owned equipment which requires specialized maintenance technicians. The MATES facility currently recycles used oil, used

antifreeze, shop towels, soiled rags or absorbents containing Petroleum, Oil, and Lubricants (POL). Spray painting operations take place only in approved spray booths and utilize water based chemical agent resistant coating (CARC) paint. The MATES is currently classified as a Very Small Quantity Generator (VSQG) of hazardous waste.

Combined Support Maintenance Shop (CSMS) (1 Facility)

The CSMS is located at Camp Williams Regional Training Center (RTC) near Camp Douglas, Wisconsin and performs major repairs and replacement of larger components such as engines, transmissions, and body parts/repairs. Additionally, it also provides specialized service for low density equipment such as electronic and sophisticated test equipment. The shop services military wheeled, track equipment and civilian buses, light, medium, and heavy duty trucks, and passenger sedans and utilizes hot water and filtered solvent in parts washers. Spray painting operations take place only in approved spray booths and utilize water based CARC paint. Touch-up painting with a brush or aerosol canister takes place outside but only during periods of no precipitation. The CSMS facility currently recycles used oil, used antifreeze, shop towels, and soiled rags or absorbents containing Petroleum, Oil, and Lubricants (POL). The CSMS is currently classified as a Very Small Quantity Generator (VSQG) of hazardous waste.

Facility Maintenance Shops (FMS) (10 Facilities)

The FMSs are situated strategically around the State to provide basic maintenance service on military vehicles and miscellaneous equipment for a set number of assigned units. Limited changing of fluids, servicing equipment, and components replacement is conducted. Most of the shops use petroleum products, synthetic lubricants, and have inside storage for control of these materials. The facilities utilize hot water and filtered solvent degreasing metal parts washing machines with scheduled change-out intervals. Refueling operations involving JP-8, diesel or Jet-A fuel from underground/aboveground storage tanks take place outdoors on impervious fueling pads with trench drains and a storm water interceptor system. Outdoor vehicle washing occurs on paved structures that are designed and engineered to prevent discharge of fuel, oil, and grease to the storm water system via a flow switch activated three-way valve. All FMS facilities currently recycle used oil, used antifreeze, shop towels, and soiled rags or absorbents containing Petroleum, Oil, and Lubricants (POL). All FMS facilities within the WIARNG are currently classified as Very Small Quantity Generator's (VSQG). Refer to **Attachment 1** for the list of WIARNG FMS facilities.

Army Aviation Support Facility (AASF) (2 Facilities)

The AASF facilities are located at Madison and West Bend and are co-located at public airports. They provide storage and all levels of maintenance for Army aircraft, primarily helicopters. The Madison facility is covered by a pre-existing Storm Water Pollution Prevention Plan (SWPPP) completed for the Dane County Regional Airport that includes the military facility. The West Bend facility is covered by a pre-existing SWPPP completed for the West Bend Municipal Airport that includes the military facility. The AASF facilities currently recycles used oil, used antifreeze, and soiled rags containing Petroleum, Oil, Lubricants (POL). Both AASF facilities are currently classified as Very Small Quantity Generator (VSQG) of hazardous waste.

Armory (69 Facilities)

WIARNG Armory facilities statewide perform limited user level periodic vehicle maintenance. Military vehicles are typically stored outdoors on paved surfaces or hard packed gravel lots and paved employee parking is provided. If present, a bulk petroleum tanker truck containing fuel is

parked on a concrete pad to provide secondary containment. Outdoor vehicle washing occurs on paved structures that are designed and engineered to prevent discharge of fuel, oil, and grease to the storm water system via a flow switch activated three-way valve. All WIARNG armories statewide are currently classified as Very Small Quantity Generator's (VSQG) of hazardous waste. Refer to **Attachment 1** for the list of WIARNG facilities.

United States Property and Fiscal Office (USPFO) (1 Facility)

The USPFO is located at Camp Williams and handles the Federal property and funds for the WIARNG, both Army and Air Guard. The USPFO is the central location and turn-in point for all WIARNG activities. Surplus hazardous chemicals are examined and evaluated for redistribution or downgraded to waste status and disposed of with State approved vendors. The USPFO is currently classified as a Small Quantity Generator (SQG) of hazardous waste. The USPFO warehouse operates under a Hazardous Material Turn-in and Hazardous Waste Collection Facility Operations Plan. This plan was written and implemented in May 2006 and was modeled to follow the requirements of a permanent Household and Very Small Quantity Generator (VSQG) collection facility as described in Wisconsin Administration Code NR600, Subchapter HH (666.900 – 666.903). This program was established for WIARNG operations only and does not provide services to the general public.

2. Environmental Performance

A. Past Performance

In the past 20 years, WIARNG worked to make significant progress recognizing many successes towards improved environmental performance, particularly through its P2, waste minimization, and training programs. The WIARNG has saved over \$33,000 in redistribution of hazardous chemicals over the last 3 years. Some of WIARNG pollution prevention activities are discussed below.

- **Filtered solvent-based parts washing.**

A trial of traditional solvent-bath-in-a-basin washing equipment made by various vendors was conducted. Knowledge gained was the effectiveness of the different solvent filtering options that are offered by various vendors. It was found that, through use of a series of filters, solvent life could be extended significantly, perhaps indefinitely. This was clearly beneficial compared to the existing Safety Kleen equipment. Drawbacks included the filter/solvent management task, and the prospect of continued solvent-based parts washing. ZEP machines with dual filtering capabilities were purchased for all maintenance shops.

- **Aqueous-based jet washing.**

Based on research and the recommendations of other military organizations, the WIARNG purchased Better Engineering aqueous jet washers for all maintenance shops. This system was chosen based on the prospect of little or no hazardous waste generation and the ease and efficiency with which the parts cleaner could be used by FMS personnel. These washers subject metal parts to a shower of biodegradable detergent-treated hot water from a spray apparatus, similar to the operation of a dishwasher, only the water is reused. Two types of jet washers were purchased: the side-loading carousel tray and the top-loading stationary tray

Impulse. Worker acceptance was slow at first, but the aqueous jet washers soon became the desired means of parts washing.

Eventually each maintenance shop was outfitted with aqueous parts washing machines of various sizes and configurations. These new machines replaced Safety Kleen parts washers on a one for one basis (two Safety Kleen machines for one jet washer in some cases, such as with the larger type jet washers).

In CY93 the total weight of waste solvents reported to the WDNR was 50,407 lbs for maintenance operations statewide. Through employment of the jet washers and filtered solvent parts washers, this figure was reduced to 8,847 lbs by CY97.

- Antifreeze Recycling

The other type of recycling that has proven successful entails the recovery and reuse of used antifreeze. Used antifreeze is collected in tanks or other containers. When nearing capacity, the shop calls a vendor to come to the site to do the recycling. In some cases the vendor removes the used antifreeze off-site for recycling, in other cases the vendor brings all associated equipment, recycles the antifreeze on-site via an ultrafiltration process, restores it to MIL-A-46153, and leaves the recycled product onsite for use by the shop. Any filter wastes produced during the process are managed by the antifreeze recycling vendor.

- POL Related Recycling.

Used oil is collected using low-profile oil drain carts and stored in an evacuation system/aboveground storage tank. When the tank is full the used oil is picked up by a vendor who burns the oil for energy recovery. The WIARNG receives money from the vendor for purchase of the used oil which goes into the WIARNG Qualified Recycling Program (QRP) fund.

Used oil filters and fuel filters are drained at each maintenance facilities and compacted in a crushing device, collected in 55-gallon drums, and are picked up for recycling by a contracted vendor. The vendor shreds the crushed filters, burns the fluff material for energy recovery, and recycles the scrap metal.

Oil absorbent materials are used to catch and contain drops of oil, fuel, and/or cleaning solvents during day-to-day maintenance and repair operations, including weapons cleaning. Absorbents are also used to respond to spills of POLs. Presently POL contaminated absorbents are bagged and stored until picked up by a vendor that extracts the oil and recycles the absorbent materials. The recovered absorbents are ultimately reissued as new absorbents.

- Lead-acid battery recycling.

The WIARNG has a lead-acid battery service contract with Interstate Batteries for all maintenance shops. Fully charged lead acid vehicle batteries are delivered by the vendor to the vehicle maintenance shops, and are used in military vehicles. Used or otherwise unserviceable batteries are collected at the shop and swapped one-for-one for new batteries with Interstate Batteries.

- Aerosol Container contents.

Spent aerosol cans traditionally had to be disposed of as hazardous waste. Each maintenance facility has been outfitted with a puncturing and crushing device which removes and collects any residual liquids into a closed container and renders the steel aerosol can suitable for recycling. Any ignitable liquid waste is collected and ultimately disposed with a hazardous waste vendor to be burned for energy recovery.

- Shop Towel laundering service.

Each maintenance shop has established a shop towel laundering service. Clean towels are delivered by a service company. At the same time, dirty towels are picked up, laundered, and used multiple times again.

- Fuel filtering carts.

This system consists of particulate filter and water separator (and associated pump) mounted on a two-wheeled dolly-type cart, for ease of movement. The carts can filter contaminated diesel or JP8 motor fuel that becomes contaminated with particulate matter or water during use, vehicle maintenance, and storage activities. Fuel processed through the cart can be restored to a usable condition. The used filters are recycled with other automotive oil filters and eventually shredded and burned for energy recovery.

- Tire recycling.

Worn out tires from military vehicles are collected at a central point (USPFO Warehouse), and sent to the Defense Reutilization and Marketing Office (DRMO) at Ft. McCoy. The DRMO sells the used tires to companies for retreading or other forms of recycling. Some of the "new" tires in the federal supply system are retreads.

- Ozone depleting compound (ODC) substitution.

The WIARNG has been replacing ODCs at every opportunity since 1993. CFCs that are used in building environment control systems have been systematically replaced with more environmentally-friendly HCFCs (usually R-22). CFC based spray cleaners that were used for electronics maintenance have been replaced by non-CFC spray cleaners. Halon 1211 and Halon 1301 fire extinguishers in buildings have been eliminated. Halons are still being used in aircraft maintenance operations on an attrition basis. Halon 1301, identified as a mission critical item, is also still used as in fire extinguishers in crew compartments of M-1 tanks.

When equipment containing refrigerants (air conditioning units, refrigerators, water coolers, etc.) become unserviceable, CFCs, are removed and recycled by a state-certified refrigerant handler.

- Various Waste Recycling Activities.

Accumulations of off-spec materials that are combustible or flammable liquids (including oil-based paints) are bulked for fuel blending (burned for energy recovery).

Unserviceable mercury batteries and nickel-cadmium batteries are shipped to a recycler as universal waste.

Fluorescent lamps and ballasts are accumulated from all WIARNG facilities and sent to a state-contracted recycling facility.

E-scrap and mercury containing devices are collected and recycled with a state contracted recycler.

- UST Closures.

Spanning the past 20 years, WIARNG has removed approximately 120 underground storage tanks (USTs) from facilities throughout the State. During the removal of these USTs, approximately 33 of the tanks leaked petroleum that required remedial cleanup of the soil. WIARNG has successfully remediated and closed 32 of these tank sites with WDNR approval and continues to remediate one additional site with residual soil and groundwater contamination. The WIARNG currently operates approximately 21 USTs at 16 facilities throughout the State.

- Indoor Firing Ranges.

WIARNG successfully closed all indoor firing ranges associated with facility buildings throughout the State. As part of the closure, WIARNG completed an Environmental/Safety Study in 2005 of all indoor firing ranges in the determination of potential lead impacts to the facility and adjacent outdoor soil conditions. From this Environmental/Safety Study, twelve facilities were identified as requiring various lead remedial activities before closure would be accepted by the WDNR. Beginning in 2008, these twelve facilities conducted soil excavation activities adjacent and near the indoor firing ranges where vents discharged air from indoor range ventilation units. Closure letters were received from the WDNR in 2009 which documented the remedial activities WIARNG conducted at each of the twelve facilities.

- ENV compliant fuel systems at all FMSs.

Over the years the WIARNG has committed considerable funding and effort to upgrade its fueling operations to be in compliance with WAC COMM 10 – Underground and Aboveground Storage Tanks regulations. The WIARNG has a total of 21 USTs at 16 locations statewide. The WIARNG also operates seven locations that store and dispense fuel to military vehicles from ASTs. All fuel systems whether UST or AST have been retrofitted or designed to have overfill protection and leak detection systems. The systems have also been designed to provide secondary containment for spills that may occur in the fueling area. Spill kits are also available on the fuel island to implement a basic spill response.

B. Current Environmental Management

The Department of the Army has chosen to adopt the International Organization for Standardization (ISO) 14001 Standard. In response, the WIARNG has implemented a mission focused Environmental Management System (eMS). The eMS program provides guidance for long-term maintenance and on-going improvements in environmental performance. Senior

leadership provides oversight and management control of the environmental compliance program through quarterly Environmental Quality Control Committee (EQCC) meetings.

The WIARNG has established Standard Operating Procedures (SOPs) for activities that generate hazardous waste, solid waste, and wastewater to include WIARNG PAM 200-1, Hazardous Chemical Management and Disposal Plan (HC-MDP) and Installation Spill and Contingency Plan (ISCP). The compliance based environmental SOPs are communicated via the WIARNG web-based Intranet, along with information on formal training classes, and annual spill response awareness briefings. Procedures are maintained to identify and respond to emergency spill situations, and to prevent/mitigate any associated environmental impacts. The WIARNG has developed a Facility Spill Contingency Plan (FSCP) for all maintenance shop and Armory facilities. The FSCP establishes duties and responsibilities for coordination, oversight, and execution of in-house spill cleanup operations and emergency response activities for spills beyond the capabilities of in-house operations. The FSCP establishes procedures to perform inspections and preventative maintenance on the military fleet for potential leaks. In addition, the Spill Prevention Control and Countermeasure (SPCC) Plans have been prepared and implemented for facilities that have aboveground petroleum storage capacities greater than 1,320 gallons. Additional training is conducted on Emergency Responder Operations Level for personnel who are appointed as a Facility On-Scene Coordinator (FOSC) or assistant FOSC or to serve on a facility Spill Response Team (SRT).

The WIARNG maintains procedures to evaluate its compliance with applicable Federal and State requirements. The documented procedure to monitor and measure compliance with environmental laws and regulations is the external and internal Environmental Performance Assessment System (EPAS) audit program. The EPAS program provides an ongoing mechanism by which the WIARNG can track corrective action progress on findings of non-compliance that have a potential impact on the environment.

C. Future Performance.

To guide our efforts and ensure continual improvement, WIARNG established a set of short and long-term environmental objectives and targets established to conform to requirements, pollution prevention (P2) activities, and continual improvement initiatives. Issues covered include:

- Protect water quality
- Increase environmental training levels
- Extend environmental training courses to new audiences within the organization
- Minimize hazardous waste generation
- Prevent Petroleum Oil and Lubricants (POL) spills
- Avoid Notices of Violation (NOVs) and/or Notice of Non-Compliance (NONs)
- Noise reduction

From this list; WIARNG identified formal objectives and targets that were reviewed by the Environmental Quality Control Committee (EQCC); a group representing senior level management from various operating departments within the WIARNG. These formal objectives and targets approved are:

- The WIARNG will continue to not only maintain compliance with applicable laws and regulations but also find ways to conduct our operations in a sustainable manner. This will be done by periodically reviewing our activities to find better ways to accomplish our assigned missions and through maintaining, upgrading and construction of new facilities which meet the LEED Silver standard.
- Review and rebid as needed the used oil, used antifreeze, and used absorbents/oil filters of the Resource, Recovery and Recycling program.
- Improve awareness and compliance with general solid waste recycling requirements at WIARNG facilities.
- Update/revise the Integrated Pest Management Plan (IPMP).
- The WIARNG proposes to incorporate additional Best Management Practices (BMPs) into the existing shop level FSCP document for storm water protection measures. The additional BMPs will include limiting facility outdoor material storage and ensure solid waste is collected in covered dumpsters and properly dispose of in a timely manner. These BMPs will be incorporated into the existing shop level FSCP so the document will provide equivalent protection of the environment in lieu of formal SWPPPs and storm water permitting requirements.
- Remediate Waupun Armory fuel oil soil contamination.
- Develop and implement environmental awareness and UST operator training programs designed to train various groups within the WIARNG on ways to minimize the impact of WIARNG operations on the environment and to maintain regulatory compliance.
- Continue environmental training efforts.

3. Baseline Date

The baseline date which the WIARNG will use to measure future progress will be 31 DEC 2009. This date was chosen since the WIARNG formerly declared eMS conformance based on Army policy, ISO 14001:2004, and our 2008 external eMS audit.