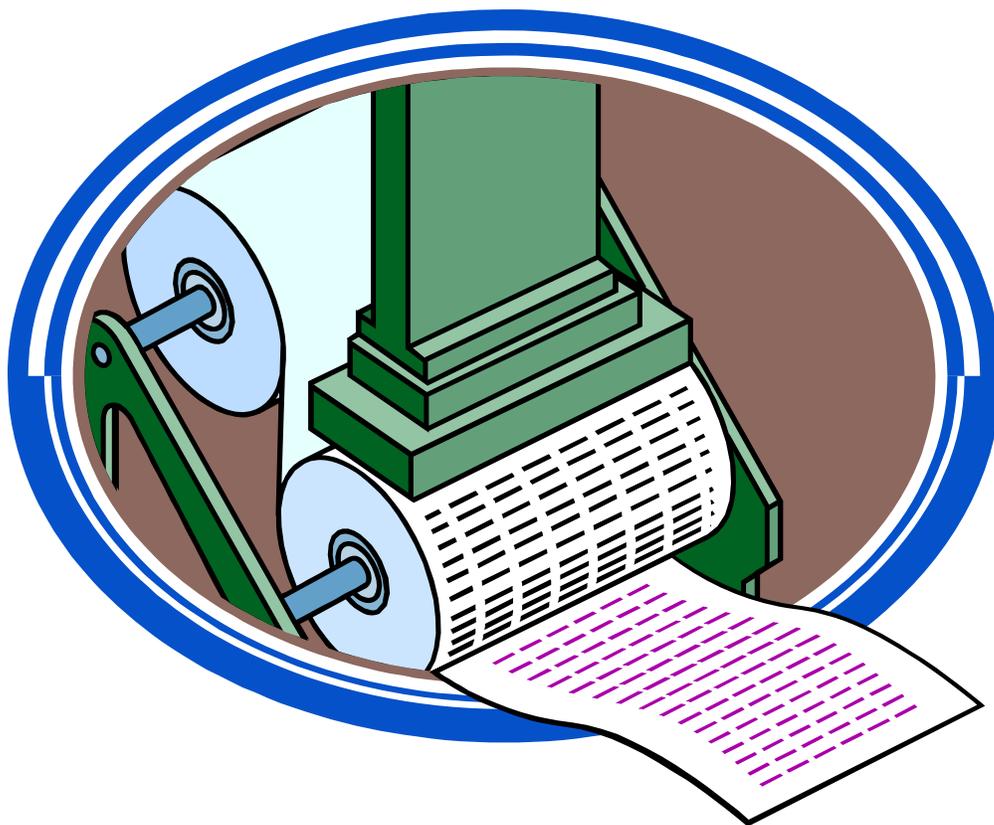


Wisconsin Printers Environmental Compliance Self-Certification Checklist and Forms



For use with Wisconsin Department of Natural
Resource's *Environmental Results Program for
Printers*

Revised May 2010

Preface

Environmental laws and regulations are complex and difficult to understand. Most regulations are not written for one particular industry. Rather, they apply to a diverse group of businesses and industries. As a result, small businesses must understand and comply with the same rules as large corporations. The problem is, most large corporations have staff trained specifically to work in environmental matters, and most small businesses, like screen printers, do not.

This Self-certification Checklist, along with its companion Environmental Compliance Assistance Workbook, will help Wisconsin's smaller printing facility owners and operators understand their regulatory obligations. Although the workbook focuses on environmental requirements, it also contains information about related topics such as health and safety standards, emergency planning and hazard communication, and pollution prevention tips. Regulations are simple to understand and easy to implement when you review the workbook and assess your compliance by completing the checklist.

The workbook and checklist were designed as part of a larger program called the Wisconsin Printers Environmental Results Program or ERP. An ERP is a tool that can be used by state regulatory agencies to help a particular industry improve their environmental performance. It is not the usual regulatory model of site-specific permitting, periodic inspections and stepped enforcement for violations. ERP combines compliance assistance, self-assessment and compliance certification, and performance measurement of key environmental business practice indicators. States have found that ERP provides:

- Improved facility accountability that may reduce the need for resource-intensive enforcement actions over the long term.
- Better information for the public and other stakeholders on how well regulators are doing in fostering environmental compliance and performance in target sectors.
- Clearer explanations for facilities about what they must do to comply with the law.
- A level playing field for all facilities in the sector.
- Measurable environmental improvements in disadvantaged neighborhoods that face multiple environmental and public health threats.
- Data on individual facility and sector-wide performance that help states target their resources in a cost-effective way.
- A stronger correlation with higher rates of environmental performance in states with strong compliance assistance programs than states with higher inspection rates.

Refer to the ***Additional Resources*** section at the end of this document for more information on this and other ERPs.

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I - Self-Certification Instructions

A. What Types of Printing Facilities is the ERP Designed to Help?

The Wisconsin Environmental Results Program (ERP) for printers was designed for printing facilities that meet certain thresholds. Printing should not be an ancillary operation at any business that makes use of the ERP compliance assistance workbook (Workbook) and self-certification checklist. A printer is any operation that **identifies** a primary Standard Industrial Classification (SIC) Code of 23, 26 or 27 or a primary North American Industry Classification System (NAICS) code of 32311x or 5111x for the operations at their business.

The ERP thresholds are established to ensure that the amounts of pollutants from a printing facility do not exceed thresholds for specific pollutant(s) where the environmental requirements included in the Workbook are expected to apply. If your facility is below these thresholds, the self-certification checklist may be used. The ERP materials are designed to help even the smallest printers. Review the **Quick Reference** that follows the ERP Thresholds to learn which sections are most important for small printers.

Review **Section A of Chapter 1** to ensure you meet the following thresholds, where *actual* emissions are less than:

- 5.0 tons per year of any one federal hazardous air pollutant (HAP)
- 12.5 tons per year of all federal HAPs, and
- 25 tons per year of volatile organic compounds (VOCs) and each of the criteria pollutants: carbon monoxide, nitrogen oxides, sulfur dioxide, and particulate matter.

ERP Thresholds:

1. For the ERP Workbook and Checklist to be most useful, printers should have HAP emissions below both of the following thresholds:

- o during the previous calendar year, my facility used fewer than 1333 gallons of total materials containing any *one* HAP as defined by federal standards, AND
- o during the previous calendar year, my facility used fewer than 3333 total gallons of *all* materials containing HAPs as defined by federal standards

2. And printers should have VOC emissions below one of the following thresholds. You may compare your VOC emissions with thresholds in the table below, or calculate actual emissions.

- o Your facility's VOC emissions are below all applicable thresholds in the table below,

Press Type	Sheetfed/ Non-heatset Lithographic	Heatset Web Offset Lithographic	Digital Printing	Screen Printing	Flexographic (Water-based and UV)	Flexographic (Solvent)
VOC Eligibility Thresholds	7,100 gallons of cleaning solvent and fountain solution additives	50,000 lbs of ink, cleaning solvent and fountain solution additives	6,000 gallons of solvent from inks, clean up solutions	7,100 gallons of solvent from inks, clean up solutions	200,000 pounds of water-based inks, coatings, adhesives	50,000 pounds of solvent from inks, dilution solvents, coatings, adhesives

OR

- o You have calculated VOC emissions to be less than 25 tons per year.

3. And printers should have Criteria Pollutant emissions below the thresholds by meeting the following criteria:

- o Fuel usage is below thresholds in the table below:

Fuel Usage Eligibility Thresholds	
Fuel (Unit Size)	Fuel Usage
Natural Gas (including propane): <10 million Btu/hr	500 million cubic feet/yr
Natural Gas (incl. propane): 10-100 million Btu/hr	350 million cubic feet/yr
Fuel Oil (sulfur = 0.05%)	2,500,000 gallons/yr

NOTE: Fuel usage can be found on your invoice/bill from the utility company or supplier.

B. What If My Business Does Not Include Printing or Does Not Meet the ERP Thresholds?

If your business does not do any printing, or it is only ancillary to your primary operations, then the ERP would not address environmental requirements that apply to all your operations. Also, if you are a printer that has emissions greater than the thresholds described above, then you may have additional requirements that are not covered in the Workbook.

C. What is a Self-Certification Checklist?

You no longer need to wait until a DNR inspector shows up at your door to find out if you are in compliance with environmental standards. If you use the compliance assistance materials in this package, you will have all the information you need to be ready for an inspection. The entire package has two parts:

1. Environmental Compliance Assistance Workbook: The workbook explains the environmental protection standards that apply to your facility and how to make sure you are complying with them. The workbook also provides information regarding best management practices and pollution prevention techniques that can help your facility minimize human health risks and environmental impacts while saving money.

2. Environmental Compliance Self-Certification Checklist: The self-certification checklist contains a series of compliance questions, which generally require “yes” or “no” answers. Your answers will show whether your facility is meeting all applicable environmental requirements.

A “Return-to-Compliance Plan” (RTCP) form is also included in this packet. Complete the Return-to-Compliance Plan form each time your facility is not in compliance with a particular question. Assign Return-to-Compliance Plans to employees to make the corrective actions.

D. Do I Have to Submit the Self-Certification?

Completing the self-certification checklist provides a comprehensive evaluation of your facility’s compliance status, making you better prepared for a random inspection. Those printers who have received DNR’s *Registration Operation Permit – Type C (ROP–C)* may use this self-certification form to satisfy the annual permit requirement for certifying compliance found in **condition F.1.** of the permit. If you wish to do that, submit the form to your compliance inspector at Wisconsin Department of Natural Resources (DNR). Otherwise, you may keep it for your own use to understand and improve your environmental performance.

If you wish to receive assistance to help you comply in areas where a Return to Compliance Plan is indicated, you may contact the Small Business Clean Air Assistance Program (SBCAAP) at the Wisconsin Department of Commerce for free, non-regulatory assistance. Contact information for the SBCAAP is provided at the end of this document.

II - Quick Reference for Very Small Printers

For the smallest of printers the comprehensive ERP Compliance Assistance Workbook can be very intimidating. The ERP was designed to include environmental requirements that applied to printers with almost no emissions because there are no automatic exemptions in many cases. Even print shops using just a few gallons of ink each year or two will find a few requirements in each chapter that apply to them.

This Quick Reference is designed to help the smallest printers go directly to the key information they need to know.

A. Part I – Regulatory Programs under DNR

Part 1 covers all of the programs under the jurisdiction of Wisconsin DNR, which includes air pollution, waste, water, and spills response.

1. Air Pollution

Be sure to read the description of air pollution sources on page A-1 of the workbook. If you have VOC emissions from press inks and solvents at or below 3 tons per year (TPY), or ink and solvent usage at or below the following levels for a specific press type...

Press Type	Sheetfed/ Non-heatset Lithographic	Heatset Web Offset Lithographic	Digital Printing	Screen Printing	Flexographic (Water-based and UV)	Flexographic (Solvent)
Very Small Printer - Thresholds	852 gallons of cleaning solvent and fountain solution additives	6,000 lbs of ink, cleaning solvent and fountain solution additives	727 gallons of solvent from inks, clean up solutions	855 gallons of solvent from inks, clean up solutions	24,000 pounds of water-based inks, coatings, adhesives	6,000 pounds of solvent from inks, dilution solvents, coatings, adhesives

...you can focus your review on the following sections in Chapter 1:

If...	review workbook section:	read workbook pages:	and answer workbook question:
you have units that provide heat using fuels (not electricity)	Section B2 - Requirements for Fuel Combustion	A-14	A.5
you have heatset presses and/or cutting and trimming operations	Section B3 - Requirements for Particular Matter	A-15	A.6 and A.7
you are a very small printer	Section B1 - VOC Emission Standards for ALL Printers	A-9 and A-10	A.3
	Section B4 - Requirements for Visible Emissions	A-15	A.8
	Section C: Hazardous Air Pollutants and State and Federal Rules, particularly Section C1 – Very Small Printers	A-17 to A-18 and A-21	A.9
	Section D2: Record Keeping	A-23, first set of bullet items	A.12
	Section E: Best Management Practices	A-25	A.14

2. Hazardous Waste

What is hazardous waste? Before you assume you don't have any hazardous waste, think carefully about the materials you use in your operation. Do you have...

- solvent-based inks, thinners, cleaning products, adhesives?
- computer-to-plate waste that is not neutralized?
- broken fluorescent lamps?

All printers should review Chapter 2 pages HW-1 through HW-10 to understand their wastes and determine their hazardous waste generator size (Very Small, Small or Large Quantity), and answer questions **HW.1 through HW.3**. Beginning with Section C: Hazardous Waste Management Requirements, the requirements are organized by generator size. Most small printers can expect to be Very Small (VSQG) or Small Quantity Generators (SQG). Very Small Quantity Generators or VSQGs can focus their review on the following sections:

For...	review workbook section:	read workbook pages:	and answer workbook question:
any generator size	Section C1.	HW-10 to HW-11	HW.4 and HW.5
VSQG specific requirements as indicated	Section C2.	HW-11	HW.6
	Section D	HW-12 to HW-13	HW.7 as it applies
	Section E	HW-14 to HW-15	HW.8
Best Management Practices	Section G	HW-16	HW.10

3. Wastewater

What is industrial wastewater? Don't assume you do not have industrial wastewater until you review your operations for the following activities:

- collecting Computer to Plate waste in a small container using a product called Chemgon;
- plate making with a wet process
- developing film
- washing/reclaiming screens
- have any liquids that come into contact with inks, solvents or for cleaning press equipment

If you have such operations, you should review all of Chapter 3. If you do **not** have these operations, then you can review just sections A.7 (if you wash vehicles on site for any reason), and **E through H in Chapter 3**. Answer all questions related to those sections (**WW.6, and WW.10 through WW.15**) that match operations at your facility (i.e., if you have either a Silver Recovery Unit or Computer to Plate system).

4. Storm Water

Even very small printing operations can be a source of storm water contamination if they do any one of the following:

- store used pallets outside without protection from rain;
- store trash in other than covered dumpster;
- not closing the cover on a dumpster after depositing trash; or
- have deposits of ink residue on the roof or other surfaces outside.

If you do **not** have anything related to your operation exposed to the elements, you may submit a No Exposure Certification to the DNR. If you do not qualify for No Exposure Certification, you should have a Storm Water Permit from DNR. Read through Chapter 4 on Storm Water; it is just 7 pages and **the requirements apply no matter your size**.

5. Spills Response

Every shop needs to know what to do in the event of a spill. Even a **small spill of ink at the press** can be considered a spill that requires you to report it to DNR and other authorities. Review Chapter 5 to learn about your responsibilities in the event of a spill. The amended flow

chart of the **Spill Reporting Decision Process**, inserted at page SR-4, can be very helpful if you find yourself with a spill.

B. Part II – Regulatory Programs under EPA or OSHA

Part I covered all of the requirements that DNR will enforce. Part II addresses requirements imposed directly by US Environmental Protection Agency (EPA) or the US Occupational Safety and Health Administration (OSHA), and some implemented by Wisconsin Emergency Management (WEM). **Respond to questions in these chapters based on sections that apply to your operation.**

1. Spills Preparedness

Taking the correct response in emergencies can make all the difference in having a good outcome. OSHA and EPA have set up guidelines for what to do in emergencies, whether it is a spill, a fire, or natural disaster.

Here are some of the highlights in Chapter 6:

Do this...	review workbook section:	read workbook pages:	and answer workbook question:
Develop an Emergency Action Plan; if <= 10 employees this doesn't have to be written	Section A	SP-1 to SP-2	SP.1
Anyone with employees must have MSDS	Section B	SP-3 to SP-4	SP.2
Protect employees from exposure to hazardous substances – fewer requirements for VSQG than SQG or LQG	Section C	SP-4 to SP-6	SP.3
IF more than 1320 gallons of total storage of oil (can include press materials like soy-based inks and petroleum-based solvents), THEN develop a Spill Prevention, Control and Countermeasure Plan (SPCC)	Section D	SP-7 to SP-8 If >1320 gal, SP-8 to SP-9	SP.5, and if >1320 gal SP.6
Best Management Practices	Section E	SP-9 to SP-10	SP.7

2. Emergency Planning and Communication

The EPA developed a program to address accidental chemical releases and provide public access to information about chemical use in the community. Wisconsin Emergency Management (WEM) and Local Emergency Planning Committees implement those requirements in the state. Review the beginning of Chapter 7 to learn what this program includes and the table on page EP-2 highlights the different programs under Emergency Planning and Community Right to Know Act (EPCRA) and any thresholds that will trigger action on your part.

The following are highlights of requirements that will apply to even small printers:

If you...	review workbook section:	read workbook pages:	and answer workbook question:
don't store chemicals above amounts, then certify exemption with WEM	Section A: Emergency Planning	EP-2 to EP-4	EP.1
if NOT exempt from section A	Section B: Community Emergency Planning	EP-5 to EP-6	EP.2 – EP.4
have a release of chemicals to land, water or air	Section C: Emergency Release Notification	EP-6 to EP-7	EP.5

If you...	review workbook section:	read workbook pages:	and answer workbook question:
use or store certain amounts of hazardous substances, report to local emergency responders; if not, notify WEM of exemption	Section D: Community Right-to-Know	EP-7 to EP-10	EP.6 & EP.7
have at least 10 full-time employees and meet thresholds described on page EP-11	Section E: Toxic Chemical Release Inventory Reporting	EP-10 to EP-12	EP.8

III - Instructions for Completing the Self-Certification Checklist

A. Facility Information

In this section, list the name and address of your business and the individual responsible for completing the self-certification.

B. Compliance Information

These questions pertain to background information about your facility and information about whether your facility is meeting applicable environmental protection standards and requirements. The workbook contains the information you will need to answer the questions. The checklist tells you where in the workbook you can find information about the environmental requirements referred to in each question.

Consult the workbook before answering any questions. Most of the questions are “yes” or “no” questions about compliance with particular standards. If you are not in compliance with a particular requirement on the date you complete the checklist, and select a response that indicates “Submit RTCP” you should complete a Return-to-Compliance Plan (described below) to explain any corrective actions.

It is your responsibility to keep your facility in compliance with environmental protection requirements at all times. You may be subject to enforcement action if your facility does not comply with the standards. The checklist includes some questions that ask whether you have been doing a routine activity for the past year, such as properly maintaining equipment. Be sure to comply with all requirements throughout the year.

C. Pollution Prevention

Using pollution prevention and waste reduction opportunities can be a means of complying with environmental regulations. These practices also increase overall environmental performance and cost competitiveness. There is no right or wrong answer to the question of how many actions you have taken in this chapter. The intent is to gauge how many facilities are adopting more pollution prevention actions over time.

D. Certification Statement

There are specific positions within a business that are approved as the “responsible corporate official” and have the authority to sign the certification statement. Check the appropriate position as outlined in Section D below.

E. Return-to-Compliance Plan (RTCP) Form

If your facility uncovers a requirement that is not met when you go through the checklist, complete the RTCP form. The form asks you to indicate the requirement you are violating, what action you plan to take to comply, and when you will be in compliance with the requirement. If you can comply prior to submitting the checklist, then include the RTCP with information on what you did to comply and the date it was completed.

A separate form is required each time your answer to a checklist question indicates that an RTCP is required. If you need more forms, make the necessary number of copies or call Renee at the SBCAAP at (608) 264-6153 for additional copies.

F. Submitting the Forms

Make multiple copies of the checklist questions before you begin. That will save time in the event you wish to submit an official certification and need a clean copy.

If you wish to satisfy the annual compliance certification required in the ROP-C, then submit the self-certification forms completed and signed to your compliance inspector at DNR. Go online to find the address for your local office if you do not have it:

<http://dnr.wi.gov/air/pdf/AMStaffDir.pdf>.

If instead you would like to receive compliance assistance services from the SBCAAP, submit a completed form (does not need to be signed) to:

**Renee Lesjak Bashel
Department of Commerce
SBCAAP – 5th Floor
PO Box 7970
Madison WI 53707-7970**

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 Environmental Compliance Self-Certification



A. Facility Information

Facility Name		Facility SIC	Facility ID Number
Facility Street Address			
City		State	Zip Code
Phone Number	Fax Number	*Number of Employees	
Contact Person Name		Title	Telephone Number
*Some requirements apply only if 10 or more employees at facility.			
Contact Email Address			

B. Compliance Information

- Answer all questions, unless you are directed to skip a question.
- A response containing "Submit RTCP" means you should complete the Return to Compliance Plan at the end of the checklist.
- Do not answer questions that you are directed to skip.

Part I: Regulatory Programs Under DNR

Chapter 1—Air Pollution

A.1. Do you fall within the eligibility thresholds for the ERP? <i>(Read Section A, page A-2 to A-8.)</i>	<input type="checkbox"/> Yes. Continue with next question.	<input type="checkbox"/> No. STOP using the checklist and workbook.	
A.2. What is your facility's VOC Size Category? <i>(Read Section B, page A-8.)</i>	<input type="checkbox"/> Very Small	<input type="checkbox"/> Small	<input type="checkbox"/> Medium
A.3. Are you meeting all VOC emission requirements listed in this section? <i>(Read Section B1, page A-9 to A-10)</i>	<input type="checkbox"/> Yes. (Very Small and Small Printers skip to A.5. unless you have a control device.)	<input type="checkbox"/> No. Submit RTCP.	
A.4. Medium Printers and Small or Very Small using a control device: Are you meeting all applicable VOC emission standards listed in this section? <i>(Read Section B1, page A-11 to A-14)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.	
A.5. Can you meet the fuel requirements? <i>(Read section B2, page A-14)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.	
A.6. Do you meet the PM requirements for heatset presses? <i>(Read section B3, page A-15)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.	<input type="checkbox"/> NA
A.7. Have you applied the recommended actions for particulate matter control from paper trim systems? <i>(Read section B3, page A-16)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.	<input type="checkbox"/> NA
A.8. Do you meet the visible emission requirements? <i>(Read Section B-4, page A-16 to A-17)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.	<input type="checkbox"/> NA

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A.9. Very Small Printers: Are your HAP emissions below all the thresholds for the compounds listed in the table on A-19? <i>(Read section C1, page A-17 to A-18 and A-21)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Contact SBCAAP for assistance.
A.10. Small and Medium Printers: Are your HAP emissions below the table thresholds on page A-19 through A-21? <i>(Read section C2, page A-21 to A-22.)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Contact SBCAAP for assistance.

A.11. Are you reporting air emissions via DNR's Annual Emissions Inventory? *(Read section D1, page A-22)*

Yes. **Skip to question A-12.**

No. Complete questions 11a-11d:

11a. Fuel Usage – enter all that apply:

<input type="checkbox"/> Natural gas in units <10 million BTU/hr: _____ million cubic feet per year	<input type="checkbox"/> Natural gas in units 10 to <100 million BTU/hr: _____ million cubic feet per year	<input type="checkbox"/> Distillate fuel oil w/sulfur = 0.05%: _____ gallons per year	<input type="checkbox"/> Distillate fuel oil with sulfur = 0.5%: _____ gallons per year
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11b. VOC Usage/ Emissions (complete one):

<input type="checkbox"/> material usage: _____ gallons or pounds (circle one) of all solvent based materials per year	<input type="checkbox"/> emissions: _____ pounds per year
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11c. Federal HAP Usage/Emissions (complete one):

<input type="checkbox"/> material usage _____ gallons or pounds (circle one) of all solvent based materials per year	<input type="checkbox"/> emissions: _____ pounds per year
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11d. State HAP Emissions (answer one):

<input type="checkbox"/> We are below the thresholds in the HAPs Usage Threshold table.	<input type="checkbox"/> We have calculated emissions below the thresholds in the state HAP rule.
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A.12. Are you maintaining all records required for your size printer? <i>(Read section D2, page A-23 to A-24)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.
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A.13. Have you evaluated all construction or modification projects during the past 12 months to make sure you are still eligible for the ERP and ROP? (NO is an acceptable answer when submitting this self-certification for the first time.) <i>(Read section E, page A-24 to A-25)</i>	<input type="checkbox"/> Yes.	<input type="checkbox"/> No	<input type="checkbox"/> Not applicable. No changes made in last 12 months.
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A.14. Have you adopted any of the recommended Best Management Practices (BMPs)? <i>(Read page A-25)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.
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Chapter 2—Solid and Hazardous Waste

HW.1. Do you have a recycling program that includes items such as office paper, plastic, e-waste, aluminum, etc.? (It's not necessary to have all listed to check Yes.) <i>(Read page HW-1)</i>	<input type="checkbox"/> Yes.	<input type="checkbox"/> No.	
HW.2. Do you generate any hazardous waste? [Hazardous waste may include: cleaning solutions for presses, screens, parts; untreated fixer; solvent based inks, coatings or adhesives; solvent soaked rags/wipes.] <i>(Read section A, page HW-2 to HW-5)</i>	<input type="checkbox"/> Yes. Continue with next question.	<input type="checkbox"/> No. Skip to Question HW.10.	
HW.3. What is your generator status? <i>(Read section B, page HW-5 to HW-10)</i>	<input type="checkbox"/> VSQG	<input type="checkbox"/> SQG	<input type="checkbox"/> LQG
HW.4. Do you keep all drums/containers with hazardous waste closed unless adding or removing waste? <i>(Read section C1, page HW-10)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
HW.5. Are your containers labeled properly? <i>(Read section C1, page HW-10 to HW-11)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.	
HW.6. Are you handling your HW appropriately based on the generator requirements? <i>(Read section C2, page HW-11 to HW-12)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.	
HW.7. Are you following all of the waste accumulation and storage requirements? <i>(Read section D, page HW-12 to HW-13)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
HW.8. Are you meeting the proper hazardous waste transportation/shipping requirements? <i>(Read section E, page HW-14 to HW-15)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.	
HW.9. SQG and LQG: Are you meeting the applicable training requirements? <i>(Read section F, page HW-15)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Develop a training plan.	
HW.10. Have you adopted any of the recommended BMPs? <i>(Read page HW-16)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.	

Chapter 3—Wastewater

WW.1 Do you generate any industrial wastewater? [Wastewater may include: photo-processing wastewater, waste fountain solution, wet plate-making waste, press/process cleaning solutions.] <i>(Read page WW-1)</i>	<input type="checkbox"/> Yes. Continue with next question.	<input type="checkbox"/> No. Answer only questions WW-6, and WW-11 to WW-15.
WW.2. Are you on a septic system? <i>(Read page WW-1)</i>	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. Skip to question WW-4.
WW.3. Do you discharge industrial wastewater to a septic system? <i>(Read section A1, page WW-2)</i>	<input type="checkbox"/> Yes. Cease discharge. Submit RTCP.	<input type="checkbox"/> No
WW.4. Do you discharge industrial wastewater to a Publicly Owned Treatment Works (POTW - the public utility)? <i>(Read section A2, page WW-2)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Skip to question WW.6.

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WW.5. Are you in compliance with the POTW's sewer use code and requirements? <i>(Read section A2 and A3, page WW-2 to WW-3)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
WW.6. Do you discharge industrial wastewater to the ground, or surface water without a permit? <i>(Read section A4 to A7, pages WW-3 to WW-5)</i>	<input type="checkbox"/> Yes. Cease discharge, unless you meet criteria in A5 and/or A8, in Chapter 3. Submit RTCP.	<input type="checkbox"/> No
WW.7. Do you store non-hazardous wastes in tanks, drums, or containers? <i>(Read section B, page WW-5)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Skip to question WW.9.
WW.8. Are you in compliance with the requirements for storing non-hazardous wastes in tanks, drums, or containers? <i>(Read section B, pages WW-5 and WW-6)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.
WW.9. Do you ship/haul your untreated silver bearing waste off-site for recycling? <i>(Read section D, pages WW-6 to WW-7)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.
WW.10. Do you have warning signs posted at every sink in the prepress, press and post press areas warning employees not to put hazardous wastes, process chemicals, solvents and waste inks down the drain? <i>(Read section E, pages WW-7)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Post appropriate signs.
WW.11. Do you perform photo processing, plate imaging or other operations that generate a silver bearing wastewater? <i>(Read section F, pages WW-7 to WW-8)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Skip to question WW.13.
WW.12. Do you have a Silver Recovery Unit? <i>(Read section F, pages WW-7 to WW-8)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
WW.13. Do you generate Computer to Plate (CTP) wastes? <i>(Read section G, page WW-8)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Skip to question WW.15.
WW.14. Are you meeting the CTP requirements? <i>(Read section G, pages WW-8 to WW-10)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit RTCP.
WW.15. Have you adopted any of the recommended BMPs? <i>(Read page WW-11)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.

Chapter 4—Storm Water

SW.1. Have you previously filed for a permit or filed a No Exposure Certification (NEC)? <i>(Read section A, page SW-1)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit NEC or apply for permit.
SW.2. Have you made changes at your facility, according to the list, in order to qualify for No Exposure Certification? <i>(Read section A, page SW-1 to SW-4)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No

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SW.3. No Exposure Certification *(Read section B, page SW-5)*

3a. Does your facility qualify for No Exposure Certification?	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Answer 3b.
3b. If you previously filed for No Exposure Certification, has this self-inspection revealed items that were exposed?	<input type="checkbox"/> Yes. Correct.	<input type="checkbox"/> No
SW.4. Have you adopted any of the recommended BMPs? <i>(Read page SW-6)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.

Chapter 5—Spills Response

SR.1. Spills reporting *(Read sections A and B, pages SR-1 to SR-9)*

1a. Have you had a spill within the past 12 months?	<input type="checkbox"/> Yes. Answer SR.1b.	<input type="checkbox"/> No. Skip to the next chapter.
1b. Was the amount of the spill above reportable quantities?	<input type="checkbox"/> Yes. Answer SR.1c.	<input type="checkbox"/> No. Skip to the next chapter.
1c. Did you follow all the proper reporting requirements?	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit proper reports and RTCP.

Part II: Regulatory Programs Under EPA or OSHA

Chapter 6—Spills Prevention

SP.1. Have you developed an Emergency Action Plan and trained employees on it? <i>(Read section A, pages SP-1 to SP-3)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Develop a plan and train all employees.	<input type="checkbox"/> NA, <10 employees
SP.2. Have you developed a HAZCOM program, including all 4 elements? <i>(Read section B, pages SP-3 to SP-4)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Develop a HAZCOM program.	
SP.3. If your employees may be required to respond to spills, have you developed an emergency response plan that meets HAZWOPER requirements? <i>(Read section C, pages SP-5 to SP-6)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Develop an emergency response plan.	<input type="checkbox"/> NA, VSQG and evacuate
SP.4. Have your employees that respond to spills received the necessary training to be competent under your HAZWOPER program? <i>(Read section C, pages SP-6 to SP-7)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Ensure necessary training and competencies are met.	<input type="checkbox"/> NA, VSQG and evacuate
SP.5. Do you meet the criteria that would trigger SPCC plan requirements? <i>(Read section D, pages SP-7 to SP-8)</i>	<input type="checkbox"/> Yes. Continue with next question.		<input type="checkbox"/> No. Skip to question SP.7.
SP.6. Do you have a complete and updated SPCC plan? <i>(Read section D, pages SP-8 to SP-9)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Prepare a complete SPCC plan.	

Environmental Compliance Self-Certification



SP.7. Have you adopted any of the recommended BMPs? (Read page SP-10)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.	
Chapter 7—Emergency Planning and Communication			
EP.1. Are you subject to the emergency planning requirements in EPCRA section 302? <i>(Read section A, page EP-2 to EP-4)</i>	<input type="checkbox"/> Yes. Continue with next question.	<input type="checkbox"/> No. Skip to question EP.5.	
EP.2. Have you identified a facility emergency coordinator and notified the LEPC of their contact information? <i>(Read section B, pages EP-4 to EP-5)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
EP.3. Have you filed the Emergency Planning Notification Fee Statement in the past year, and paid the fee if appropriate? <i>(Read section B, page EP-5)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
EP.4. Have you worked with the LEPC to develop an emergency response plan? <i>(Read section B, page EP-6)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
EP.5. Have you reported any releases in the past year? <i>(Read section C, page EP-6)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
EP.6. Have you filed a chemical storage/ chemical list report in the past year? <i>(Read section D1, pages EP-7 to EP-8)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
EP.7. Have you filed in the past year, either a Tier II annual reporting form or a notification that you are exempt? <i>(Read section D2, pages EP-9 to EP-10)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
EP.8. If you have at least 10 FTE, have you filed your TRI report in the past year? <i>(Read section E, pages EP-10 to EP-12)</i>	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA. We have <10 FTE.

C. Pollution Prevention

Chapter 8—Pollution Prevention and Waste Reduction

PP.1. How many Pollution Prevention Practices have you adopted prior to completing this certification? 0-<10 10-<25 25-<50 50+



You have completed the certification questions. Go to Section D on the next page to complete the certification signature.



D. Certification Statement

Facility Name

Facility SIC Code

Facility ID Number

Facility Street Address

City

State

Zip Code

Print Responsible Corporate Official Name

Title

Date

"I attest under the pains and penalties of perjury:

- (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification statement;
- (ii) that, based on my inquiry of those individuals responsible for obtaining the information, the information contained in this submittal is to the best of my knowledge, true, accurate, and complete;
- (iii) that systems to maintain compliance are in place at the facility and will be maintained for the coming year even if processes or operating procedures are changed over the course of the year; and
- (iv) that I am fully authorized to make this attestation on behalf of this facility.

I am aware that there are significant penalties including, but not limited to, possible fines and imprisonment for willfully submitting false, inaccurate, or incomplete information."

Source of Signatory Authority:

If a Corporation:

- President
- Secretary
- Treasurer
- Vice President (if authorized by corporate vote)
- Representative of the above (if authorized by corporate vote and if responsible for overall operation of the facility)

If a Partnership:

- General Partner

If a Sole Proprietorship:

- Proprietor

Signature

Note: Complete all required Return to Compliance Plans (RTCP) forms (if any) and attach to this document before signing this statement.

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Environmental Results Program For Printers



Return to Compliance Plan

Facility Name

Facility ID Number (or Facility Address, if no ID number previously assigned by DNR)

Instructions:

Complete a separate Return to Compliance Plan for EACH question on the self-certification form that requires one.

Submit a Return to Compliance Plan for all requirements that are not met. If you correct the violation before submitting the self-certification form, then indicate what was done and when the action was completed.

Completing this form does not relieve the facility of its responsibility to operate in compliance with applicable requirements. Failure to operate in full compliance with applicable requirements may result in enforcement actions that may include fines or penalties.

Return to Compliance Plan

1. What is the self-certification form question number for which you are reporting noncompliance?

Question Number

2. Provide a brief description of the specific requirement in violation?

Requirement Description

3. What corrective action will you take to return to compliance?

Describe Corrective Action(s)

4. What have you/will you do to prevent further violations of this requirement?

Describe Preventive Action(s)

5. Return to compliance date – date you will be back in compliance after completing your corrective action (or when actions were completed if corrected immediately):

MM/DD/YYYY

(Should be no more than 90 days.)

Signature

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Additional Resources:

DNR Permits and Forms

- DNR's Permit Primer (walks through all permits and approvals): <http://dnr.wi.gov/permitprimer/>
- Printer's Guide to Permits: <http://dnr.wi.gov/air/permits/printers.htm>
- Registration Operation Permit – Type C: <http://dnr.wi.gov/air/pdf/ROptypeCfinal.pdf>
- Air Emissions Inventory Reporting: <http://dnr.wi.gov/air/emission/>
- Hazardous Waste Annual Reporting: <http://dnr.wi.gov/org/aw/wm/hazard/reporting/>

Other Environmental or Related Assistance

- Printers National Environmental Assistance Center: <http://www.pneac.org/>
- Printing Industries of America: <http://www.printing.org/page/4343>
- Sustainable Green Printing Partnership: <https://www.sgppartnership.org/index.php?PageID=1>
- Small Business Clean Air Assistance Program compliance information for Wisconsin printers: <http://commerce.wi.gov/bd/BD-CA-PrintingIndustry.html>
- Other **Printing Resource links** compiled by Small Business Environmental Assistance Programs: <http://www.smallbiz-enviroweb.org/Industry/sectorweb.aspx#Printing2>
- Other **Sustainable Business links** compiled by Small Business Environmental Assistance Programs: <http://www.smallbiz-enviroweb.org/Resources/sustainableinfo.aspx>

Glossary of Terms/Abbreviations

Review the workbook for more details on how these terms are used as well as other terms in the checklist that may not be listed here.

- **BMP** – Best Management Practices: practices established by others in the industry as methods to reduce or eliminate pollutant
- **Criteria pollutants** – term used to describe pollutants regulated by US EPA through national ambient air quality standards, includes: carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxides and ozone (volatile organic compounds or VOCs traditionally regulated as source of ozone).
- **FTE** – Full Time Equivalents: the number of hours equivalent to full time employment, used to describe the number of employees as cut off for applicability of certain requirements
- **HAP** – Hazardous Air Pollutant: describes list of chemicals regulated by state and/or federal agencies for toxic effects on human health and the environment
- **LQG** – Large Quantity Generator: largest category in hazardous waste generator, with most stringent requirements
- **RTCP** – Return to Compliance Plan: form used to spell out plan for corrective action when printer finds they do not comply with certain requirements
- **SPCC** – Spill Prevention, Control and Countermeasure plan: a plan required by US EPA for facilities storing more than 1320 gallons of oil based materials
- **SQG** – Small Quantity Generator: middle category in hazardous waste generator
- **VOCs** – Volatile Organic Compounds: a group of chemicals regulated because known to react in sunlight to form ozone, the criteria pollutant
- **VSQG** – Very Small Quantity Generator: the smallest category in hazardous waste generators, having fewest requirements

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Please contact SBEAP with your comments and suggestions about the forms.
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