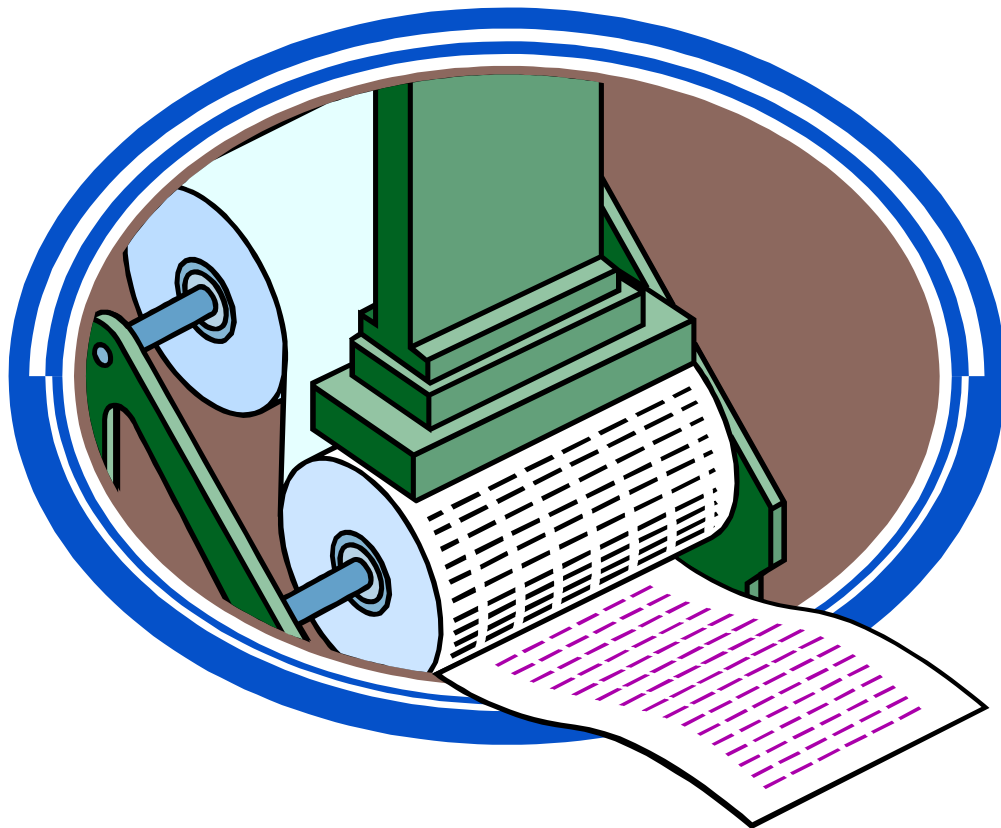


# **Wisconsin Printers Environmental Compliance Self-Evaluation Checklist**



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

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# Self-Evaluation Checklist Instructions

## ***Criteria for Printing Facilities to Utilize the Checklist***

The Printers Environmental Compliance Workbook and this Self-Evaluation Checklist comprise a two-part compliance assistance package provided under the Wisconsin Environmental Results Program (ERP) for Printers. Any printer with printing operation identified under 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 will be subject to the requirements included in the ERP. There are two exceptions:

- ☞ Manufacturers or other businesses where printing is an ancillary operation.
- ☞ Facilities with actual emissions of air pollution greater than any one of the following levels:
  - ☞ 25 tons per year of any criteria air pollutant (Volatile Organic Compounds (VOCs), Nitrogen Oxides, Carbon Monoxide, Sulfur Dioxide, Particulate Matter), or
  - ☞ 5 tons per year of any single Hazardous Air Pollutant (HAP), or
  - ☞ 12.5 tons per year for any combination of HAPs.

If your facility falls into either or both of these categories, the workbook and checklist do not cover all requirements that may apply to your facility.

## ***Participation***

To determine whether it is appropriate for your facility to utilize the Printer Environmental Compliance workbook and the Self-Evaluation Checklist, you should review Section A in the Introduction – *Who is this workbook designed to help?* Complete the evaluation of your ink and solvent usage or calculate your emissions as indicated to determine if your facility's air emissions are within the ranges covered by the workbook. Larger printers with emissions greater than the listed thresholds may have requirements that are not addressed within this workbook and are advised against solely using the workbook and this checklist for determining compliance.

## **What is a Self-Evaluation Checklist?**

In order to improve environmental protection and generate savings for both government and business, printers can now perform a self-evaluation of their facility's compliance to determine if they meet all requirements established by the Wisconsin Department of Natural Resources (DNR).

This new, common-sense approach to regulation holds great promise for making it easier for the printing industry to meet – and surpass – Wisconsin's environmental regulations. This package, developed in conjunction with a group of industry representatives, contains the materials needed to complete the self-evaluation checklist. The accompanying workbook provides the information needed to help you understand and comply with state and federal environmental regulations.

*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 be ready for an inspection. The entire package has two parts:

- 1. Environmental Compliance Assistance Workbook:** The workbook explains the environmental standards that apply to your facility, and how to make sure you are complying

with these standards. The workbook is designed to be used in conjunction with the accompanying self-evaluation checklist and can also be used as a reference for day-to-day operations. The workbook also provides information regarding best management practices and pollution prevention techniques that can help your facility minimize health risks and environmental impacts while saving money. Finally, the workbook explains how to certify your compliance with environmental regulations.

- 2. Environmental Compliance Self-Evaluation Checklist:** The checklist contains a series of compliance questions, which generally require “yes” or “no” answers about whether your facility is following the applicable environmental requirements. After completing the checklist, you will know your facility’s compliance status.

### What will DNR do if I’m NOT in compliance with a requirement?

As a result of using these materials, some printing operations may discover areas where their facility is not in compliance. Actions needed to achieve compliance should be taken as soon as possible.

Participants in the Printer ERP program may be covered by the deferred civil enforcement provision in Wisconsin’s Compliance Audit Program if they voluntarily submit the completed Self-Evaluation form and a summary of corrective actions for each requirement found not to meet the rules. If a compliance issue is discovered by the DNR before compliance is achieved, the DNR may take enforcement action.

The Compliance Audit Program offers limited liability for certain requirements and situations to printers that complete an environmental audit. Reviewing the workbook and completing the checklist qualifies as performing an internal environmental audit under the program. To gain coverage under the program, follow these steps:

- Notify the DNR of the intent to complete an audit of the environmental requirements, submitted at least 30 days prior to completing the audit. Submit [Notice of Intent to Perform an Environmental Improvement Program Audit \(4800-021\) \[PDF\]](#) to the DNR to confirm your eligibility.
- Complete the audit using the Compliance Assistance Workbook and Self-Evaluation Checklist. Summarize areas where the checklist indicates the facility is not in compliance in an audit report. You can use the [Environmental Compliance Audit Report Template \(4800-023\) \[PDF\]](#) or your own format to submit the audit report.
- Report any findings to the DNR within 45 days of completing the audit report and prepare a compliance plan. Provide a schedule for any requirements that will require time to implement a compliance plan. Follow the compliance plan timelines described in the Audit Program.

For more information, visit: <http://dnr.wi.gov/business/audit.html>.

### Do I have to participate in the ERP?

Participation in the program is **voluntary**. Completing the self-evaluation checklist provides a comprehensive evaluation of your facility’s compliance status, making you better prepared for a DNR compliance inspection. The Compliance Audit Program can be applied to any facility submitting the self-evaluation form to DNR as indicated in the steps above. If you do not wish to utilize the Compliance Audit Program, consider completing the workbook and checklist for internal use.

## Step-by-Step Instructions for Completing the Self-Evaluation Checklist

### A. Facility Information

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

### 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 any requirement on the date you complete the checklist, complete a Return-to-Compliance Plan (described below) so you can follow up with corrective action.

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 the 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 official” and have the authority to sign the certification statement. Check the appropriate position as outlined in Section D below. Currently, the DNR accepts this certification for the Air Program’s Registration Operation Permit annual permit certification requirement. **Submit the final copy following the appropriate program(s) permit certification filing process.**



## Environmental Compliance Self-Evaluation

### A. Facility Information

_____ Facility Name		_____ Facility SIC Code	_____ Facility ID Number
_____ Facility Street Address			
_____ City		_____ State	_____ Zip Code
_____ Phone Number	_____ Fax Number		
_____ Contact Person Name		_____ Title	_____ Telephone Number
_____ Contact Email Address			

### B. Compliance Information

Answer all questions, unless you are directed to skip a question. Do not answer questions that you are directed to skip.

#### Part I: Regulatory Programs Under DNR

#### Chapter 1—[Air Pollution](#) (click the link to download the chapter)

A.1. What is your facility's VOC Size Category? (Read Section A, page A-1 to A-2.)	<input type="checkbox"/> Very Small	<input type="checkbox"/> Small	<input type="checkbox"/> Medium
A.2. Are you meeting all VOC emission requirements listed in this section? (Read Section A1, page A-2 to A-4)	<input type="checkbox"/> Yes.		<input type="checkbox"/> No. Contact SBEAP for assistance.
A.3. <i>Medium Printers (and Small or Very Small using a control device):</i> Are you meeting all applicable VOC emission standards listed in this section? (Read Section A1, page A-4 to A-8)	<input type="checkbox"/> Yes (Very Small and Small Printers <b>skip</b> question <b>A.3.</b> <b>unless</b> you have a control device.)		<input type="checkbox"/> No. Contact SBEAP for assistance.
A.4. Can you meet the requirements for fuel burning units? (Read section A2, pages A-8 to A-10)	<input type="checkbox"/> Yes		<input type="checkbox"/> No. Contact SBEAP for assistance.
A.5. Do you meet the requirements for PM from heatset presses? (Read section A3, pages A-10 to A-11)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Contact SBEAP for assistance.	<input type="checkbox"/> NA
A.6. Have you applied the recommended actions for particulate matter control from paper trim systems? (Read section A3, page A-11 to A-12)	<input type="checkbox"/> Yes		<input type="checkbox"/> No. Recommended.
A.7. Do you meet the visible emission requirements? (Read Section A4, page A-12)	<input type="checkbox"/> Yes		<input type="checkbox"/> No. Contact SBEAP for assistance.
A.8. <i>Very Small Printers:</i> Are your HAP emissions below all the thresholds for the compounds listed in the table on A-15 to A-16? (Read section B and B1, page A-13 to A-16)	<input type="checkbox"/> Yes		<input type="checkbox"/> No. Contact SBEAP for assistance.



## Environmental Compliance Self-Evaluation

### B. Compliance Information (cont.)

A.9. <i>Small and Medium Printers:</i> Are your HAP emissions below the table thresholds on page A-15 through A-19? (Read section B2, page A-17 to A-19.)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Contact SBEAP for assistance.	
A.10. Are you reporting air emissions via DNR's CRS? (Read section C1, page A-19) [ <i>Start here:</i> <a href="https://dnr.wi.gov/topic/AirEmissions/">https://dnr.wi.gov/topic/AirEmissions/</a> .]	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Contact SBEAP for assistance.	
A.11. Are you maintaining all records required for your size printer? (Read section C2, pages A-19 to A-20)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Contact SBEAP for assistance.	
A.12. Have you applied for the appropriate permit or are you exempt? (Read section D, pages A-20 to A-21)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. Contact SBEAP	<input type="checkbox"/> Not applicable. Facility is exempt.
A.13. Have you adopted any of the recommended BMPs? (Read page A-22)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.	

### Chapter 2—[Solid and Hazardous Waste](#) (click the link to download the chapter)

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.") (Read section B1, page HW-2 to HW-3)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. Start a program.	
HW.2. Do you generate any hazardous waste? (Read section B2, pages HW-3 to HW-6.)	<input type="checkbox"/> Yes. Continue on with question HW.3.	<input type="checkbox"/> No. Skip to Chapter 3.	
HW.3. What is your generator status? (Read section C, page HW-6 to HW-10)	<input type="checkbox"/> VSQG	<input type="checkbox"/> SQG	<input type="checkbox"/> LQG
HW.4. Do you meet the requirements that apply to <u>all</u> hazardous waste generators? (Read section D1, page HW-11)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Correct immediately.	
HW.5. Are your containers labeled properly? (Read section D2, pages HW-11 to HW-12)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Correct immediately.	
HW.6. Are you meeting all of the waste handling requirements specific to your generator status? (Read section D3, page HW-12 to HW-13) [ <i>For the SQG/LQG annual reporting:</i> <a href="https://dnr.wi.gov/topic/waste/annualreport.html">https://dnr.wi.gov/topic/waste/annualreport.html</a> .]	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Correct immediately.	
HW.7. Are you following all of the waste storage and accumulation requirements? (Read section E1, page HW-13 to HW-14)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Correct immediately. Contact SBEAP for assistance.	
HW.8. Are you meeting the proper hazardous waste transportation/shipping requirements? (Read section E2, page HW-15 to HW-16)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Correct immediately.	
HW.9. Are you meeting the applicable training requirements? (Read section F, page HW-16)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Develop a training plan and provide training.	
HW.10. Have you adopted any of the recommended BMPs? (Read page HW-17)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.	





## Environmental Compliance Self-Evaluation

### B. Compliance Information (cont.)

#### Chapter 3—[Wastewater](#) (click the link to download the chapter)

WW.1. Are you on a septic system? (Read page WW-1)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. Skip to question WW.3.	
WW.2. Do you discharge industrial wastewater to a septic system? (Read section A1, pages WW-1 to WW-2)	<input type="checkbox"/> Yes. <b>Cease discharge unless covered by General Permit #WI-0055611.</b>	<input type="checkbox"/> No.	
WW.3. Do you discharge industrial wastewater to a POTW? (Read section A2, page WW-2)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. Skip to question WW.5.	
WW.4. Are you in compliance with the POTW's sewer use code and requirements? (Read section A2 and A3, pages WW-2 to WW-3)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. Work with POTW to make corrections.	
WW.5. Do you discharge industrial wastewater, non-contact cooling water, or wastewater from vehicle washing to the ground or surface water without a permit? (Read section B, page WW-3)	<input type="checkbox"/> Yes. <b>Cease unpermitted discharge and apply for appropriate permit.</b>	<input type="checkbox"/> No. Skip to question WW.7	
WW.6. Is the facility covered by all appropriate WPDES permits for discharges of industrial wastewater to the ground or surface water and demonstrating compliance? (Read sections B.1 to B.4, pages WW-4 to WW-5)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. <b>Cease unpermitted discharge and apply for appropriate permit.</b>	
WW.7. Do you store non-hazardous wastes in tanks, drums, or containers? (Read section C, page WW-5)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. Skip to question WW.9	
WW.8. Are you in compliance with the requirements for storing and shipping off-site non-hazardous wastes in <a href="#">tanks</a> , drums, or containers? (Read section C, page WW-6)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. Make corrections.	
WW.9. Do you ship/haul your untreated silver bearing waste off-site for recycling? (Read section D, page WW-7)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No.	
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? (Read section E, page WW-7)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. Recommended that operations post signs where appropriate.	
WW.11. Do you perform photo processing, plate imaging or other operations that generate a silver bearing wastewater? (Read section F, page WW-8)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Skip to question WW.13.	
WW.12. If you have a SRU, are you operating it according to manufacturer's specifications? (Read section F, page WW-8)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Work with manufacturer to correct.	<input type="checkbox"/> NA. Skip to question WW.12.
WW.13. Do you generate CTP wastewater? (Read section G, page WW-9)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Skip to question WW.15.	



## Environmental Compliance Self-Evaluation

### B. Compliance Information (cont.)

WW.14. Are you meeting the CTP requirements for neutralization and other requirements? (Read section G, pages WW-9 to WW-11)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Make corrections.
WW.15. Have you adopted any of the recommended BMPs? (Read section H, page WW-11)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.

### Chapter 4—[Storm Water](#) (click the link to download the chapter)

SW.1. Have you previously filed for a permit or filed a No Exposure Certification? (Read section A, page SW-1)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
SW.2. Do you meet all the elements, or have you made changes at your facility in order to qualify for No Exposure Certification? (Read section A, page SW-2 to SW-4)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
SW.3. No Exposure Certification (Read section B, page SW-4 to SW-5)		
3a. Does your facility qualify for No Exposure Certification?	<input type="checkbox"/> Yes. <a href="#">Complete the form 3400-188.</a>	<input type="checkbox"/> No. <a href="#">Submit an application for discharge permit.</a>
3b. If you previously filed for No Exposure Certification, has this self-inspection revealed items that were exposed?	<input type="checkbox"/> Yes. Make changes to qualify or <a href="#">submit application for discharge permit.</a>	<input type="checkbox"/> No. Continue with the next section.
SW.4. Have you adopted any of the recommended BMPs? (Read section C, page SW-6)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.

### Chapter 5—[Spills Response](#) (click the link to download the chapter)

SR.1. Have you had a spill within the past 12 months? (Read section A, pages SR-1 to SR-3)	<input type="checkbox"/> Yes. Answer SR.2.	<input type="checkbox"/> No. Continue with the next section.
SR.2. If you had a spill, was the amount of the spill above reportable quantities? (Read section B, pages SR-3 to SR-6)	<input type="checkbox"/> Yes. Answer SR.3.	<input type="checkbox"/> No. Continue with the next section.
SR.3. If you had a spill above reportable quantities, did you follow all the proper <a href="#">reporting requirements</a> ? (Read section B, pages SR-6 to SR-8)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. <a href="#">Submit proper reports immediately.</a>



## Environmental Compliance Self-Evaluation

### B. Compliance Information (cont.)

#### Part II: Regulatory Programs Under EPA or OSHA

##### Chapter 6—[Spills Prevention](#) (click the link to download the chapter)

SP.1. Have you developed an Emergency Action Plan and trained employees on it? (Read section A, pages SP-1 to SP-2)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Develop a plan and train all employees.
SP.2. Have you developed a HAZCOM program, including all 4 elements? (Read section B, page SP-3)	<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? (Read section C, pages SP-4 to SP-6)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Develop an emergency response plan.
SP.4. Have your employees that respond to spills received the necessary training to be competent under your HAZWOPER program? (Read section C, pages SP-6 to SP-7)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Ensure necessary training and competencies are met.
SP.5. Do you meet the criteria that would trigger SPCC plan requirements? (Read section D, pages SP-7 to SP-8)	<input type="checkbox"/> Yes. Continue with this section.	<input type="checkbox"/> No. Continue on to question SP.7.
SP.6. Do you have a complete and updated SPCC plan? (Read section D, pages SP-8 to SP-9) [ <a href="#">Templates are available for some facilities.</a> ]	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Prepare a complete SPCC plan.
SP.7. Have you adopted any of the recommended BMPs? (Read section E, page SP-9)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Recommended.

##### Chapter 7—[Emergency Planning and Communication](#) (click the link to download the chapter)

EP.1. Are you subject to the emergency planning requirements in EPCRA section 302? (Read section A, page EP-2 to EP-4)	<input type="checkbox"/> Yes. Continue with section B.	<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? (Read section B, page EP-5)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Choose a coordinator before proceeding.
EP.3. Have you worked with the LEPC to develop an emergency response plan? (Read section B, page EP-5)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Develop a plan before proceeding.
EP.4. Have you filed the Emergency Planning Notification form in the past year, and paid the fee if appropriate? (Read section B, page EP-5) [ <a href="https://dma.wi.gov/DMA/wem/preparedness/epcra">Reporting information and forms: https://dma.wi.gov/DMA/wem/preparedness/epcra.</a> ]	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Complete the form, pay the fee if needed.



## Environmental Compliance Self-Evaluation

### B. Compliance Information (cont.)

EP.5. Have you prepared a list of chemicals and their Reportable Quantities that are present in your facility? (Read section C, pages EP-6 to EP-7)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Prepare the list.	
EP.6. Do you need to file a chemical storage report? (Read section D.1, pages EP-7 to EP-8)	<input type="checkbox"/> Yes.	<input type="checkbox"/> No. Skip to EP.8.	
EP.7. Have you filed in the past year, either a Tier II annual reporting form or a notification that you are exempt? (Read section D.2, pages EP-8 to EP-9)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Complete the appropriate form and submit.	
EP.8. If you have at least 10 FTE and chemicals above reporting thresholds, have you filed your TRI report in the past year? (Read section E, page EP-10)	<input type="checkbox"/> Yes	<input type="checkbox"/> No. Submit immediately.	<input type="checkbox"/> NA. <10 FTE or below reporting.

### C. Pollution Prevention

**Chapter 8—[Pollution Prevention and Waste Reduction](#)** (click the link to download the chapter)

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



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



## Environmental Compliance Self-Evaluation

### D. Certification Statement

"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."

**When complete, if submitting for other than annual ROP-C certification, mail this form to:**

SBEAP – OB/7  
Wisconsin Department of Natural Resources  
P.O. Box 7921  
Madison, WI 53707-7921

**When submitting for ROP-C certification, check the Air Permit webpage for updated contact information:**

<http://dnr.wi.gov/topic/AirPermits/Options.html>, Registration tab.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

#### 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

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