

ABOUT THE COMPLIANCE AUDIT DISCLOSURE

The Wisconsin Environmental Improvement Compliance Audit Program is a voluntary program for progressive companies or other regulated entities that strive to keep in compliance with all Department of Natural Resources (DNR) and EPA regulations. As part of the program companies voluntarily disclose the findings of an environmental compliance audit of their facility and commit to correct any violations found in accordance with the program.

To be eligible for the program you must submit an Environmental Compliance Audit Report in writing to the DNR.

This template for the Environmental Audit Compliance Report is provided for your convenience. You are not required to use it, but we encourage you to do so to facilitate processing. If you choose to use a different format, include all the information requested in this form. Submit a separate compliance audit report for each different property location even if the violations found at the different locations were discovered during the same environmental audit. Personal information collected on this form may be made available to requesters under Wisconsin's Open Records law (ss. 19.31-19.39, Wis. Stats.).

ELIGIBILITY CRITERIA

To be considered for the Wisconsin Environmental Improvement Program the entity and the entity's "Environmental Compliance Audit Report" (audit report) must meet all of the criteria contained in s. 299.85, Wis. Stats. Among these the entity must:

- *Have notified the DNR of their intent to conduct an environmental compliance audit no fewer than 30 days before beginning the audit. This notice must have included a statement, signed by an official of the regulated entity who is responsible for environmental compliance, that acknowledges that deferred civil enforcement does not apply to violations discovered by the regulated entity before the beginning of the environmental compliance audit.*
- *Have conducted an environmental compliance audit of the facility.*
- *Within 365 days of their initial notification and within 45 days of completion of the final written report of the findings of the environmental compliance audit, submit a written "Environmental Compliance Audit Report" to the DNR containing the information required in s. 299.85(3), Wis. Stats.*
- *Commit to correct the violation with 90 days of submitting the audit report or according to a compliance schedule approved by the DNR.*
- *Within two years of submitting this "audit report, has not had a suit filed by the Department of Justice or had a citation issued by the DNR or a local government to enforce an environmental requirement because of a violation involving the facility.*

1. Facility Information & Documentation of Environmental Compliance Audit Notification

Name of Audited Facility

Date the facility submitted a notice of intent to perform an environmental compliance audit to DNR:
(Please attach a copy of this notification (form 4800-021) with your environmental compliance audit report.)

The facility is: ☐ non-governmental ☐ governmental

Date the facility submitted a notice of intent to perform an environmental compliance audit to DNR:
Are there any changes in the facility address, permits or contact information from the attached audit notification?
☐ No ☐ Yes If yes, indicate the changes below in 1.a. and 1.b.

1.a Changes in Facility Information

Facility Name	County	Location
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Street Address	City	State	Zip
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Mailing Address	City	State	Zip
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Identify any numbers of any Permits or Licenses held by Audited Facility that have changed.

1.b Changes in Facility Contact Information

Name of Facility Contact	Title		
Street Address	City	State	Zip
Phone Number	Fax Number	E-mail address	

2. Environmental Compliance Audit Information

Information provided in this section must support the entity's claim that an environmental compliance audit was conducted and that the information disclosed arose from that audit. All information that is submitted will be available for public inspection unless, you request and receive DNR approval for confidential status as a trade secret, as defined in s.134.90(1), Wis. Stats.

Name and title of facility representative for whom the environmental compliance audit was conducted.

Name of person and firm who conducted the environmental compliance audit.

Date environmental compliance audit was completed.

Date final written report of finding of the environmental compliance audit of the facility was completed.

Was the scope of the actual compliance audit and the activities, practices and operations that were examined as part of the audit the same as those described in the original audit notification?

☐ Yes ☐ No If no, provide a brief description of the changes below.

3. Violation Disclosure Information

Use the **ENVIRONMENTAL COMPLIANCE REPORT SUMMARY TABLE** (Table A, reference page 4) to identify and disclose each violation revealed by the environmental compliance audit. In order to meet the Legislature's annual reporting requirements for the program, we request that you use Table A to categorize each violation. Check all columns that apply to the violation. Make additional copies of the table if necessary.

Specify the type of violation, indicating if it involves each of the following:

- 1) Failure to have a required permit or other approval;
- 2) Failure to have a required plan;
- 3) Violation of a condition of a permit or other approval;
- 4) Release of a substance to the environment;
- 5) Failure to Report;
- 6) Other (describe).

Also, specify the type of violation, indicating the environmental regulation(s) it relates to:

- 7) Air;
- 8) Surface Water;
- 9) Ground Water;
- 10) Solid Waste;
- 11) Hazardous Waste;
- 12) Other Environmental Regulation (describe).

Indicate the time until the correction is completed (from the date the audit report is submitted). Chose one of the following:

- 13) Already completed;
- 14) Less than or equal to 90 days;
- 15) More than 90 days and less than 365 days.

4. Violation(s) Resolution/Response Strategy for Violations that will be corrected within 90 Days of Submitting This Report

For each violation that the entity has already corrected or commits to correct within 90 days of the submittal date of this Environmental Audit Report, provide the information requested below in writing.

- (a) Violation Name or Identification Number. Use the same name or number as in Column 1, Table A.
- (b) Identify the permit, approval, or regulation to which the violation relates.
- (c) Describe the violation and the length of time that the violation may have continued (s. 299.85(3)(b), Wis. Stats.). Include location information and attach a map if needed.
- (d) Describe the actions taken or proposed to be taken to correct the violation (s. 299.85(3)(c), Wis. Stats.) including dates.
- (e) Describe the measures that the entity has taken or will be take to prevent future violations and a timetable for implementing these measures (s. 299.85(3)(f), Wis. Stats.)

5. Violation(s) Resolution/Response Strategy for Violations that will require more than 90 Days to Correct

For each violation that the entity commits to correct that will require more than 90 Days to correct based on the submittal date of this Environmental Compliance Audit Report, provide all the information requested below in writing.

- (a) Violation Name or Identification Number. Use the same name or number as in Column 1, Table A.
- (b) Identify the permit, approval, or regulation to which the violation relates.
- (c) Describe the violation and the length of time that the violation may have continued (s. 299.85(3)(b) Wis. Stats.). Include location information and attach a map if needed.
- (d) A description of actions taken or proposed to be taken to correct the violations.
- (e) A commitment to correct the violations within 90 days of submitting the report or according to a compliance schedule approved by the department. Note that the DNR can not approve or issue a compliance schedule that extends longer than 12 months beyond the date of approval of the compliance schedule.
- (f) For violations taking over 90 days to correct, propose a compliance schedule that contains the shortest reasonable periods for correcting the violations (s. 299.85(3)(e) Wis. Stats.) and provide a statement that justifies the proposed compliance schedule.
- (g) Describe the measures that will be taken to minimize the effects of the violation during the compliance schedule (s. 299.85(3)(e), Wis Stats.).
- (h) Propose stipulated penalties to be imposed if the regulated entity fails to comply with the proposed compliance schedule (s. 299.85(3)(em), Wis. Stats.).
- (i) Describe the measures that the entity has taken or will take to prevent future violations and a timetable for implementing these measures (s. 299.85(3)(f), Wis. Stats.).

6. Contact Information & Signature of Responsible Environmental Official

Name of Person	Title	Company or Entity
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Mailing Address (if different from facility)	City	State	Zip
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Phone Number	Fax Number	E-mail address
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- This disclosure meets the criteria for eligibility in the Environmental Improvement Program (s. 299.85, Wis. Stats.).
- I commit to correct the violations with 90 days of submitting the audit report or according to a compliance schedule approved by the DNR.
- I have the authority to make this disclosure and commitments.
- I commit to the above statements and certify that all information provided is true and correct under penalty of law.

Signature

Date Signed

Table A ENVIRONMENTAL COMPLIANCE REPORT SUMMARY TABLE Facility Name _____

[illegible]

.* Instructions: Summarize each violation you are disclosing in the Environmental Compliance Report Summary Table for the Environmental Compliance Audit Report. Attach additional copies of this table as necessary.