

**Colorado Department of Public Health and Environment**  
**Small Business Assistance/Generator Assistance Program**  
Environmental Results Program for the Printing Industry – Phase III  
**2010 Compliance Certification Instructions**

▪ **WHAT IS THE COMPLIANCE CERTIFICATION?**

The 2010 Compliance Certification is a part of Phase III of the Environmental Results Program (ERP) that has been developed by The Small Business Assistance Program (SBAP) and the Generator Assistance Program (GAP) in cooperation with the Printing & Imaging Association Mountain States (PIAMS). Companies like yours are advised to conduct routine self-assessments to identify opportunities to reduce your environmental health and safety impacts. It's makes good business sense. An annual self-assessment is a requirement for companies that become PIAMS "Green Members". More information on the PIAMS Green Member program is available online at [www.piams.org](http://www.piams.org).

The 2010 ERP is a voluntary program. The Compliance Certification part of the ERP was developed to help you self-certify compliance with the environmental safety and health requirements that may apply to your business. This package contains the materials your company needs to complete and submit the *Certification*. The accompanying *Compliance Certification Workbook* has been designed to provide information and resources to help you fill out the *Certification* by yourself. Please note: submission of the *Certification* is voluntary and results will be used to determine the compliance assistance needs of businesses like yours to support ongoing certification programs for small businesses and to verify compliance for companies seeking to become or continuing to be listed as PIAMS Green Members. The identities of individuals and entities participating in the ERP and the compliance information provided to PIAMS will not be disclosed to regulatory personnel. All information will remain in the confidence of PIAMS. We appreciate your participation in this program.

▪ **THE CERTIFICATION PACKAGE HAS TWO PARTS:**

1. **ERP Compliance Certification (Checklist):** This form has five sections:

- ✓ **Facility Information** that identifies the facility and a contact person;
- ✓ **Environmental Compliance Questions**, which are a series of mostly "yes" or "no" questions about whether or not your facility is following the applicable environmental requirements; and
- ✓ **Occupational Health and Safety (OSHA) Compliance Questions**, which are a series of mostly "yes" or "no" questions about whether or not your facility is following the applicable health and safety requirements;
- ✓ **Back on Track Plan**, which is not an enforcement report but a plan for you to follow to get your facility back on track on environmental, health and safety issues that apply to your facility. PIAMS will follow up with you to make sure you have addressed your stated issues and to see if you require assistance to help your business return to compliance.
- ✓ **Certification Statement** to be signed by the facility owner, manager, or other authorized employee.

Review each section of the Compliance Certification with the people who are most familiar with that particular part of the operation, such as the purchasing managers, printing technicians, or supervisory staff. Your responses to the questions should show whether potential hazards or polluting activities are occurring that may be addressed by an operational change, product substitution or better housekeeping.

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**2. *Printing & Imaging Compliance Certification Workbook***

You may obtain the *Compliance Certification Workbook* by contacting PIAMS at (303) 771-1578 or the SBAP at (303) 692-3175. The workbook explains the environmental health and safety standards that may apply to your facility and provides resources to help you understand them. The workbook also provides information about important aspects of developing a *Sustainable Management System (SMS)* for your company. You should retain the workbook as a reference.

▪ **COMMONLY ASKED QUESTIONS:**

**1. *Do I have to certify?***

An annual self-assessment is a requirement for companies that become PIAMS Green Members. Completion of the *Compliance Certification* in Phase III of the Environmental Results Program can begin the process or fulfill the annual self-audit requirement. We encourage you to participate and improve the environmental health and safety performance of your company.

**2. *How do I submit a Compliance Certification?***

Once you have agreed to voluntarily participate in the 2010 Environmental Results Program for the Printing & Imaging Industry, **please complete the *Compliance Certification* and mail it prior to April 30, 2010** to:

Kathy Lauerman  
Printing & Imaging Association Mountain States  
5000 Osage Street, Suite 700  
Denver, CO 80122  
(303) 771-1578  
[klauerman@piams.org](mailto:klauerman@piams.org)

**3. *How Do I Fill Out the Compliance Certification?***

- a. Read the workbook to understand the environmental health and safety requirements that may apply to your facility.
- b. Assemble your environmental permits (if any), your purchase records and air emissions inventories, your hazardous waste manifests for the past 12 months, your hazardous material and emergency planning records and plans and documentation of your OSHA programs and procedures.
- c. Make a copy of the *Certification* form to use as a working draft.
- d. Read the form. Identify all the questions that apply to your facility. (You will not have to answer all of the questions on the form.) The form itself may direct you to skip certain questions. Do not answer questions that you are directed to skip.

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- e. Identify all the questions with which you are already in compliance and those where you will need to make changes in your operation to come into compliance.
- f. If you need help, call the Small Business Assistance Program, a free and confidential consultation service, at (303) 692-3175.
- g. Review the Completeness Checklist at the end of these instructions. Once your *Certification* is complete, copy your answers from the draft, make a copy of the completed certification for your files, and submit the final hard copy to the PIAMS at the address on page 2 of these instructions. Make sure you make a copy of the completed certification for your files.

**4. What is not covered by the Compliance Certification?**

Some facilities may be subject to additional state, federal or local environmental health and safety standards that are not covered in the 2010 *Compliance Certification*. You still must comply with these requirements even though they are not included on the Certification. Check with your local or state health department to obtain further information or contact PIAMS or the Small Business Assistance Program.

▪ **INSTRUCTIONS FOR FILLING OUT THE COMPLIANCE CERTIFICATION**

***Facility Information***

This section lists the name and address of your business and the individual PIAMS should contact if there are questions about your *Certification*. Include your business phone number, the business email and name and business phone number for the contact person in the space provided.

***Compliance Questions***

These questions provide PIAMS with some background information about your facility and information about whether or not your facility is following the environmental health and safety standards and requirements that apply to it. The workbook contains the information you will need to answer the questions. The form tells you where in the workbook you can find information about the specific requirements referred to in each question. *It is strongly recommended that you consult the workbook before answering any questions.* Most of the questions are “yes” or “no” questions about compliance with particular requirements or standards. If you are not in compliance with a specific requirement on the date you certify, you must add this requirement to the *Back On Track form* at the end of the Certification.

Please note that it is your responsibility to keep your facility in compliance with environmental health and safety requirements at all times. Remember, you may be subject to enforcement action if you do not comply with the standards (enforcement actions will not be as a result of your participation in this Environmental Results Program). You should be able to come into compliance with all of the standards by the time you complete the certification program. “No” answers should be very rare and only for those problems that you were unable to correct prior to certifying.

There are some questions that ask whether you have been doing a routine activity for the past year, such as properly maintaining air emission records. Be sure to comply with the requirements throughout the year. The *Certification Statement* includes a pledge that you have systems in

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place to keep your business in compliance with applicable environmental health and safety standards.

***Certification Statement***

The *Certification Statement* is a preprinted statement which says that the person signing the form:

- ✓ has reviewed it,
- ✓ believes the information being submitted is true and,
- ✓ will make sure that management systems are in place that will keep your facility in compliance with the requirements covered in the certification throughout the coming year.

The facility owner or another authorized representative of your business may only legally sign the certification statement. The person who signs the form must also print or type his or her name and title on the appropriate lines and date the form. It is important that the person who signs the certification is legally authorized to do so.

***Back on Track - Return to Compliance Plan***

If your facility is unable to comply with a standard at the time you certify, add this requirement (by section and question number) to the Back on Track Plan at the end of the Certification. The plan asks for the standard you are violating, what you plan on doing to comply and when you will be in compliance with the requirement. The Back on Track plan(s) must be submitted to PIAMS with your *Compliance Certification* on or before April 30, 2010. The deadline for companies to demonstrate compliance with Back on Track issues is June 25, 2010.

▪ ***COMPLETENESS CHECKLIST***

Complete the checklist below to make sure that you have included all of the necessary information when you submit the *Compliance Certification* to PIAMS.

- Are all *Compliance Questions* answered (except those you were directed to skip)?
- Did you consult the workbook when you were unsure of an answer?
- Did you complete the *Back on Track form* at the end of the Certification form for each noncompliance issue to help you return to compliance?
- Has the *Certification Statement* been read, understood and signed by an authorized person in your facility?
- Have you made a copy of the complete *Compliance Certification* for your records?
- Have you submitted the completed *Compliance Certification* and Back on Track form(s) on or before the due dates?

Thank you for your participation in this program!