


# Is Your Facility on the Right Path to Environmental Compliance?

Renee Lesjak Bashel  
Wisconsin Safety Council – Annual Safety Conference  
April 19, 2023



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

1

---

---

---

---

---


---

---

---

## Overview

- Main Topics
- Important Links
- Industrial Activities and Environmental Impacts
- What Activities Need DNR Permits
- Rules to Meet, No Permit Needed
  - DNR Requirements
  - US EPA Requirements
- Records and Notifications
- DNR Support and Resources



WISCONSIN DEPARTMENT OF NATURAL RESOURCES

2

---

---

---

---

---

---

---

---

## DNR Environmental Compliance Topics

- Permits
  - Air Pollution
  - Wastewater Discharge
  - Storm Water
  - Wetlands
  - Protected or Invasive Species



- Requirements
  - Waste Disposal
    - Hazardous Wastes
    - Universal/recycling
    - Demolition and Renovation Issues
  - Land or Water Contamination
  - Spills

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

3

---

---

---

---

---


---

---

---

### U.S. EPA Environmental Compliance Topics

- Emergency Planning and Community Right to Know Act (EPCRA)
  - Tier II Chemical Inventory
    - Delegated to state emergency mgmt
  - Toxic Release Inventory (TRI)
    - Also known as Form R
    - Submit to EPA
- Chemical Accident Prevention Provisions and Risk Management Plans (RMP)
- Ozone depleting substances (Refrigerants)



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

4

---

---

---

---

---

---

---

### Before we start...



ENVIRONMENTAL SUMMARY CHECKLIST:  
<https://widnr.widen.net/s/8kp5fl59fs/sb003>



SMALL BUSINESS WEBSITE:  
<https://dnr.wi.gov/topic/smallbusiness/>



DNR's SWITCHBOARD:  
<https://dnr.wisconsin.gov/topic/Switchboard>

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

5

---

---

---

---

---

---

---



## INDUSTRIAL ACTIVITIES WITH ENVIRONMENTAL IMPACT

6

---

---

---

---

---

---

---

Path to Environmental Compliance

2

Solvents/Paints/Inks



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

7

---

---

---

---

---

---

---

---

Engines/Boilers/Fuel



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

8

---

---

---

---


---

---

---

---

Dust, Particles



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

9

---

---

---

---

---

---

---

---

### Metal fab/Assembly



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

10

---

---

---


---

---

---

---

### General maintenance



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

11

---

---

---

---

---

---

---



### WHAT ACTIVITIES MIGHT NEED DNR PERMITS?

12

---

---

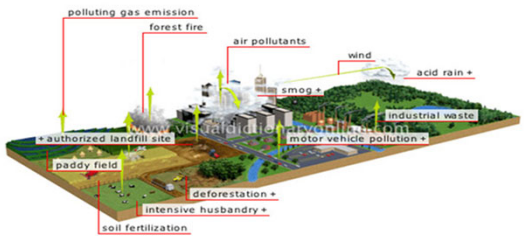
---

---

---

---

---



**Air Regulations**

- Many activities generate air pollution

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

13

---

---

---

---

---


---

---

---

**Air Permit Types**

- Obtain a permit for each facility, or change to existing facility, unless meets an exemption
  - **Construction** – for new facility or changes to existing
    - Any new or expanded piece of equipment, process line, multi-process operation, or whole facility
    - Also called “New Source Review” or NSR permit
  - **Operation** – for existing facilities
    - Required for existing facilities
    - And after construction authority expires (construction permits never expire)



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

14

---

---

---

---

---


---

---

---

**Air Permits**

- Air permit is required if emitting pollutants over certain thresholds
  - Small sources of emissions may be exempt
  - <https://dnr.wi.gov/topic/airpermits/options.html>
- Plan ahead if making changes!
  - Some permits take only 15 days, others 90 days
  - Larger permits can take over 180 days
- State and federal air regulations may apply even if no permit needed, for example:
  - Fuel combustion (emergency generators)
  - Painting large equipment or cars
  - Fugitive dust



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

15

---

---

---

---

---

---

---

---



### Wastewater Discharges

- Where will process wastewater go?
  - Ground or surface water
  - Sewer/POTW
- WI Pollutant Discharge Elimination System (WPDES) permit
  - For industrial operations that discharge wastewater to water body or storm sewer
  - DNR sets limits on pollutant levels

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

16

---

---

---

---

---

---

---

### Wastewater Permits

- DNR must approve any plans to treat wastewater before discharge
- Work with local utility/municipality to meet limits if discharging to a publicly owned treatment plant



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

17

---

---


---

---

---

---

---



### Storm Water

- Rain / snow melt picks up contaminants and carries them into bodies of water
- Will you be doing construction? Are materials being stored outdoors?
  - Can you cover all materials?
  - DNR storm water permits required
- Options for industrial permit
  - No Exposure Certification
  - General Discharge Permit
  - Industry Specific Permits (auto salvage, scrap recycling, nonmetallic mining)
  - Individual Permit

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

18

---

---

---

---

---


---

---



### Wetlands

- Avoid filling whenever possible
- Impacting wetlands requires permit
  - Restoration
  - Compensatory Mitigation
- Find out if property contains wetlands early in process to prevent delays!
  - Hire a consultant to make determination; DNR list of approved delineators
  - DNR services: Wetland Identification Service; Wetland Confirmation Service
- Army Corps of Engineers, counties, municipalities also regulate wetlands



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

19

---

---

---

---

---

---

---

### Endangered, Threatened & Invasive Species

- Know your property if planning to build or expand
  - What species are present on the property?
  - Could protected species impact a project?
    - May require permit to allow impact
    - Incentives to preserve habitat/resources
- Are invasive species present?
  - How will they impact the property?
  - What measures might you take to control or prevent their spread?
- Management part of stormwater and wetlands permit applications



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

20

---

---

---

---

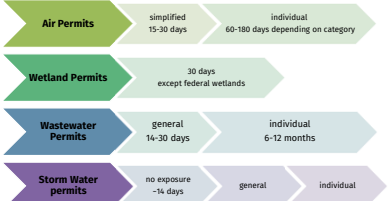
---

---

---

### Permit Applications

- Air Permits
  - <https://dnr.wi.gov/topic/AirPermits/Apply.html>
  - <https://dnr.wi.gov/topic/AirPermits/Forms.html>
- Water ePermits
  - <https://dnr.wi.gov/Permits/Water/>
- Planning
  - Allow for 2-6 months to prepare applications
  - DNR review time based on complete application; clock stops when they need more info
- Timelines:



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

21

---

---

---

---

---

---

---

Path to Environmental Compliance

7



22

---

---

---

---

---

---

---

### Air Emissions Reporting

- Reporting thresholds below permit exemption levels
- Required for any pollutant emitted above thresholds in previous calendar year
- If below thresholds, file Under Threshold Notification
- Most thresholds range 6,000 to 10,000 pounds per year
- <http://dnr.wi.gov/topic/AirEmissions/>

A screenshot of the Wisconsin Department of Natural Resources (DNR) website, specifically the Air Emissions Reporting page. The page title is "Air Emissions Reporting" and it includes a sub-header "Air Reporting System (ARS) Home for the 2021 Air Emissions Report". The page contains a table with columns for "Pollutant", "Threshold", and "Reporting Requirements". The table lists various pollutants and their corresponding thresholds and reporting requirements. The page also includes a section for "Reporting Steps" and a "Help" link.

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

23

---

---

---

---

---

---

---

### Waste Disposal

- Dispose of all waste materials properly!
  - Determine if each waste is hazardous or non-hazardous solid waste
  - Recycling certain materials can avoid hazardous waste rules
- Know how to handle hazardous waste
  - Regulations vary based on amount generated each month
- <https://dnr.wi.gov/topic/SmallBusiness/WasteOverview.html>

Three images related to waste disposal. The top image shows a building entrance with a glass door and a sign. The middle image shows a pile of hazardous waste, including a large drum and some smaller containers. The bottom image shows a blue waste container with a black lid.

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

24

---

---

---

---


---

---

---



### Hazardous Waste



- Determine if each waste is hazardous
  - <https://dnr.wi.gov/files/PDF/pubs/wa/wa1152.pdf>
  - documentation is critical for compliance
  - fillable checklist can help
    - <https://widnr.widen.net/s/wvlwrjsgzs/sb142>
- Determine generator classification based on hazardous waste amounts
- Streamlined regulations for universal waste
- Additional requirements for treatment, storage and disposal facilities and hazardous waste transporters
- Common violations:
  - <https://dnr.wi.gov/files/PDF/pubs/wa/WA850.pdf>

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

25

---

---

---


---

---

---

---

---



### Used Oil Management

What is Used Oil?

- Motor oils, greases, brake fluids, transmission fluids, other hydraulic fluids, and refrigeration oils
- NOT waste oil – oil/fuel spill clean up, fuel tank bottoms

How do you dispose used oil?

- Take to used oil collection center or to licensed service
- DO NOT USE for purposes such as dust suppression or burning
- Learn more:
  - <https://dnr.wi.gov/files/PDF/pubs/wa/WA233.pdf>

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

26

---

---

---


---

---

---

---

---



### Demolition/Renovation

- Structures cannot be burned
  - Except for approved fire fighter training exercises
  - May need local burn permits
- Do structures contain asbestos?
  - Must be trained and certified to remove asbestos
  - DNR must be notified before removal begins
    - <https://dnr.wi.gov/topic/Demo/Asbestos.html>

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

27

---

---

---


---

---

---

---

---



### Contaminated Property

- Know the environmental condition of the property to protect yourself from environmental liability
  - Check the BRRTS database & RR Sites Map tools:  
<https://dnr.wisconsin.gov/topic/Brownfields/WRRD.html>
  - Conduct Phase I & II Site Assessments, Site Investigations
  - Hire a consultant to conduct assessment
- DNR can help!

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

28

---

---

---

---

---

---


---

---

### Spill Response

- Spills require an immediate response!  
<https://dnr.wi.gov/topic/SmallBusiness/Spills.html>
- Determine if spill needs to be reported  
<https://dnr.wisconsin.gov/topic/Spills/define.html>
- Contact DNR spill coordinator for guidance on containment and cleanup  
<https://dnr.wi.gov/DocLink/rr/RR559.pdf>

• **DNR's 24-hour spill emergency hotline**  
**1-800-943-0003**



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

29

---

---

---

---

---

---

---

---

### Permit fees/Annual fees

Air Permits

Exemptions: \$0 to \$1,250  
Construction: application \$7,500, final range approx. \$5,000 - \$50,000 or more  
Operation: annual emissions fees (\$900-3000 base + \$37.51 per ton + add-ons) or simplified permits \$400/\$4,100 flat fees

Water Permits

Wetland: mitigation in-lieu fee program  
Wastewater: general \$0; individual + annual (higher of \$250-500 base or \$ per pound pollutant)  
Storm Water – annual: Tier 1 \$260; Tier 2 \$130

Waste

Annual hazardous waste generation \$350-470 base + \$20/ton

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

30

---

---

---

---

---

---

---

---

Air

Waste

Water

General

- Get an air permit for any operational change, before breaking ground or making alterations, unless meet exemption
- Report air emissions and keep records even if exempt from air permit

- Evaluate each waste material for hazards and document results
- Properly manage wastes, particularly those intended for recycling, so they don't count as hazardous
- Containers need labels according to state rule and write date when first drop of waste put in container

- Be sure you have a storm water permit or certify no exposure status
- Follow all wastewater permit monitoring and reporting frequencies

- Read ALL permits and follow each condition carefully!
- Communicate with appropriate programs any time you have an event that might violate permit/rule requirements; if unsure, ask.

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

31

---

---

---

---

---

---

---

---

U.S. EPA  
REQUIREMENTS

32

---

---

---

---

---

---

---

---

Emergency Planning  
and Community  
Right to Know Act

EPCRA was created in 1986 to plan for accidental chemical release responses and to provide access to information about chemical hazards in local communities.

EPCRA Provisions and Reporting Requirement Summary				
Section	Sections 302/303	Section 304	Sections 311/312	Section 313
Topic	Emergency Planning Notification	Emergency Release Notification	Hazard Chemical Inventory Reporting	Toxic Chemical Release Inventory / TRI (Form R)
Chemicals identified	356 extremely hazardous substances (EHS)	>1,000 hazardous & extremely hazardous substances	Products with SDS	650 toxic chemicals and categories
Threshold levels	Threshold Planning Quantity (TPQ) 1-10,000 lbs on site at any one time (chemical specific)	Reportable Quantity (RQ) >1-5,000 lbs. released in 24 hr period	1. TPQ, or 2. 500 lbs for extremely hazardous substances (EHS) and 3. 10,000 lbs on site at any one time for other chemicals	1. 25,000 lbs/year manufactured or processed 2. 10,000 lbs/year "otherwise used" 3. certain persistent bioaccumulative toxics have lower thresholds
Reporting requirements	Section 302: one time notification to WEM Section 303: updates as necessary	Emergency notification for each occurrence of release of RQ	Section 311: one time notification, updated as necessary Section 312: Tier II report due annually by 1 March to WEM through WHOPRS	TRI (form R) report due annually by 1 July to EPA

\\NHRTSXNS\UJUPWYR.JS.Y\K\B.FYZWFC\BJXTZWHJX\SLSWA\_NL.T\

33

---

---

---

---

---

---

---

---

### EPCRA

- Sections 302 through 312 managed by Wisconsin Emergency Management
  - <https://wem.wi.gov/epcra/>
  - Learn about EPCRA, find lists of regulated chemicals and current reporting forms: <https://wem.wi.gov/forms-resources/>
  - If have chemicals above thresholds on-site, then file annual Tier II (312) report by March 1 and pay fee
  - Submit report online: <https://wem.wi.gov/whoprs/>
- Section 313, Toxic Release Inventory (TRI) filed with U.S. EPA
  - Covered industries with listed chemicals above thresholds must submit by July 1 every year
  - <https://www.epa.gov/toxics-release-inventory-tri-program/reporting-tri-facilities>

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

34

---

---

---

---

---


---

---

---

### Risk Management Program or RMP

- **Chemical Accident Prevention** Provisions (40 CFR Part 68, or Section 112r, Clean Air Act), published June 21, 1996
- Facilities develop a **Risk Management Program** to manage potential risks associated with processes using regulated substances
  - Source has more than threshold quantity of a regulated substance in a process
  - Process is any group of interconnected vessels and separate vessels located such that a highly hazardous chemical could be involved in a potential release
  - Elements of program based on levels of risk at facility
- Program levels
  - Program 1 is low risk: no releases last 5 years resulting in response, endpoint of impact is closer than receptors, coordinate with LEPC
  - Program 3 is high risk: cannot meet Program 1 and in listed NAICS or subject to OSHA PSM
  - Program 2 is anything not in 1 or 3



[View Photo](#) by Wisconsin Authority is licensed under [CC BY](#)

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

35

---

---

---

---

---

---

---

---

### RMP Applicability

- Regulated substances:
  - <https://www.epa.gov/rmp/list-regulated-substances-under-risk-management-plan-rmp-program>
  - 77 Listed **Toxic** Substances
    - Ex: Anhydrous Ammonia, 10,000 pound threshold quantity
  - 63 Listed **Flammable** Substances
    - Ex: Methane, 10,000 pound threshold quantity
- Exemption
  - Ammonia used as an agricultural nutrient, when held by farmers, is exempt from all provisions of this part
- Exclusion
  - Flammable substances used as fuel or held for sale as fuel at retail facilities

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

36

---

---

---

---

---

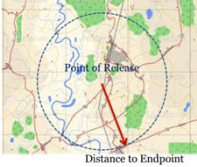
---

---

---

### RMP Requirements

- Submit in the RMP:
  - Offsite consequence analysis (OCA)
  - Five-year accident history
  - Prevention program/Program 2 or 3
  - Emergency response program
- Update RMP:
  - At least once every 5 years from the date of the original submission or most recent update, or no later than:
    - 3 years after a newly regulated substance is listed by EPA
    - The date on which a regulated substance is first present above a threshold quantity
  - Within 6 months of a change that...
    - Requires a revised PHA or hazard review
    - Requires a revised OCA analysis
    - Alters the Program level
- De-registration within 6 months if rule no longer applies



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

37

---

---

---

---

---

---

---

---

### Ozone Depleting Substances (Refrigerants)

- Section 608 of Clean Air Act
  - Prevent the release of ozone-depleting substances (ODS) when stationary equipment is being serviced, maintained, repaired, or disposed.
  - Reduce the use and emission of ODS from stationary equipment.
  - Maximize the recapture and recycling of ODS from stationary equipment.
  - Ensure the safe disposal of ODS.
  - <https://www.epa.gov/section608/managing-refrigerant-stationary-refrigeration-and-air-conditioning-equipment>
- Affects small businesses like grocery stores, food product storage, salvage yards accepting appliances, others...
  - <https://www.epa.gov/section608/stationary-refrigeration-resources-businesses>
  - <https://www.epa.gov/section608/revised-608-rule-fact-sheets>
- Related - AIM Act to reduce HFCs used as replacements for ODS
  - <https://www.epa.gov/climate-hfcs-reduction>

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

38

---

---

---

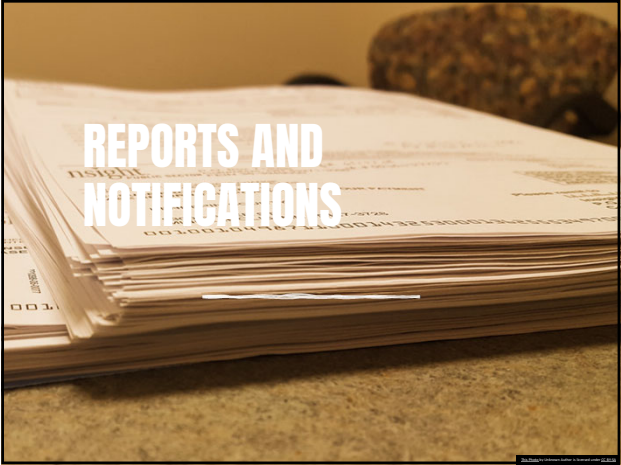
---

---

---

---

---



39

---

---

---

---

---

---

---

---

### Reports due to DNR

- Most programs require access through Switchboard:  
<https://dnr.wisconsin.gov/topic/Switchboard>
  - set up access for key staff and Responsible Official
  - many reports require certification from Responsible Official as final submittal/signature step
- Due dates of reports most facilities will need
  - Air Program
    - permit certification and annual compliance summary report - Jan 31 or March 1
    - annual emissions report - March 1
  - Waste Program:
    - annual waste generation report - March 1
    - episodic generation – 30 days before event, or 72 hours after if unplanned
  - Water Program
    - wastewater discharge – see permit for frequencies
    - wastewater land application – January 31
    - storm water facility compliance inspection – annually, from permit issuance date
    - storm water visual monitoring – quarterly
- Remediation
  - find evidence of spill or contamination, submit through RR portal
  - <https://dnr.wisconsin.gov/topic/Brownfields/Submittal.html>

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

40

---

---

---

---

---

---

---

---

### Reports due to WEM or EPA

- EPCRA
  - Tier II – March 1 to WEM
  - TRI – July 1 to EPA
- RMP – submit new plan to EPA
  - 5 years from date of original submission or most recent update
  - 3 years after a newly regulated substance is listed by EPA
  - Date a regulated substance is first present above a threshold quantity
  - Within 6 months of a change that triggers new hazard analysis or Program level
- Refrigerants (ODS)
  - owners with equipment containing at least 50 pounds of ODS that leaks more than 125% of its full charge within a calendar year, must report to EPA by March 1
  - submit to [608reports@epa.gov](mailto:608reports@epa.gov)

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

41

---

---

---

---

---

---

---

---



## RESOURCES

42

---

---

---

---

---

---

---

---



43

---

---

---

---

---

---

---


---

### Not sure where to start with DNR or EPA rules?

**Small Business Environmental Assistance Program (SBEAP)**

- Free, confidential help with environmental rules
- Plain-language explanations and resources
- Trainings, webinars, emission calculators and more
- One-on-one help by phone, or site visits
- On-line resources available 24/7

Helpline: 855-899-3021  
E-mail: [DNRsmallbusiness@wi.gov](mailto:DNRsmallbusiness@wi.gov)  
Website: <https://dnr.wi.gov/topic/smallbusiness>



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

44

---

---

---

---

---

---


---

---



Small Business Advisor - January 2021

- Construction and Demolition
- Environmental Regulations
- Permit Primer




2021-2022 Compliance Calendar for Gasoline Dispensing Facilities

Created by the Wisconsin Small Business Environmental Assistance Program



Tools & Resources



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

45

---

---

---

---

---

---

---

---



Think you are doing things right, but want to be sure?

Enviro-check

- Voluntary self-audit, report violations/corrective actions to DNR
- Limited liability – no or low fines if eligible for the program and corrections made in <60 days (180 days for small business stationary sources)
- Improves facilities' knowledge and environmental performance through audit findings and corrective actions
- Reduces environmental risks and impacts

envirocheck

Phone: 608.266.6887

Email: [DNREnvirocheck@wi.gov](mailto:DNREnvirocheck@wi.gov)

Website: <https://dnr.wi.gov/topic/EnviroCheck/>

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

46

---

---

---

---

---

---

---

---

Why Might a Company Use Enviro-Check?

- Change in operations
- Staff/management turnover
- Buy, sell or expand facility
- Some types of general complaints
- Identify efficiencies and cost-savings
- Requirement of customers, supply chain, certifications, lenders or risk management
- Due diligence review for shareholders or potential investors



WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

47

---

---

---

---

---

---

---

---

Going above and beyond basic compliance. Looking for flexibility and recognition?

Green Tier

- Voluntary program providing recognition and support for superior environmental performance
- Negotiate flexibility in permits, inspection frequency, etc.
- Assigned Single Point of Contact (SPOC) at DNR
- Shifts the focus from enforcement to encouragement

greentier

Phone: 608.267.6817

Email: [Greentier@wi.gov](mailto:Greentier@wi.gov)

Website: [greentier.wi.gov](http://greentier.wi.gov)

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

48

---

---

---

---

---

---

---


---

Path to Environmental Compliance

16

### Green Tier Tools Drive Environmental Performance

- Environmental management systems
- Routine audits by approved auditors
- Annual reports
- Continual Improvement / Efficiencies
- Shared tools and resources
- Single points of Contact (SPOCs)
- Improved DNR relations



ENVIRONMENTAL MANAGEMENT SYSTEM  
*Embracing the Environment*

WISCONSIN DEPARTMENT OF NATURAL RESOURCES | DNR.WI.GOV

49

---

---

---

---

---

---

---

### CONNECT WITH US

Renee Lesjak Bashel

[renee.bashel@wisconsin.gov](mailto:renee.bashel@wisconsin.gov)  
608-347-7940  
OR  
[DNRsmallbusiness@wi.gov](mailto:DNRsmallbusiness@wi.gov)  
855-889-3021

 /WIDNR

 @WIDNR

 @WI\_DNR

 /WIDNRTV

 "WILD WISCONSIN:  
OFF THE RECORD"

50

---

---

---

---

---

---

---