

Date: August 30, 2021

Subject: Reminders for Primarily **PM Emitting** Facilities Covered by a Registration Permit

Dear Registration Permit holder:

Your business operation is currently covered by a Registration Operation Permit (ROP) issued by the Department of Natural Resources (DNR) Air Program. The DNR's Small Business Environmental Assistance Program (SBEAP) and the Air Program work together on providing services and assistance to small businesses. This email is provided as a general resource for facility contacts; if current on all requirements, there is no action required in response to this information. Copies of this and previous reminder emails are available [online](#) in PDF format.

PM emission limits for processes

Emissions of particulate matter (PM) are regulated in chapter [NR 415](#) of the Wisconsin Administrative Code. The following activities have specific limits on PM:

- General processes emitting PM have limits determined by the process weight equation in s. NR 415.05(2), or source specific limits in s. NR 415.05(1).
 - Asphalt, concrete or aggregate mix plants, grain processing, grinding, drying, mixing, conveying, sizing or blending are processes with specific limits in NR 415.05(1).
- Crushed stone, sand and gravel plants, ledge rock quarries and industrial mines have limits in NR 415.075 or 415.076.
- Fuel combustion sources such as boilers and heaters have limits in NR 415.06 based on the heat input capacity.

Stationary gasoline or diesel engines have a limit of 0.50 pounds of PM per million BTU heat input under NR 485.055.

Restricted Use Reciprocating Internal Combustion Engines (RICE)

Emergency electric generators, or emergency engines, are now defined in Wisconsin Administrative Code under the term [Restricted Use RICE](#). Restricted use RICE are exempt from needing a construction permit under s. NR 406.04(1)(w), Wis. Adm. Code. Following rule changes effective in fall 2020, applicability of the RICE NSPS subparts IIII or JJJJ no longer disqualifies the engine from other permit exemptions. As long as an engine is certified to meet the applicable RICE NSPS, it may be considered for exemption.

PM modeling requirements

Facilities emitting PM₁₀ (particulate matter less than 10 microns in size) must protect air quality standards. In general, any facility that can emit more than **5 tons of PM₁₀ per year** must confirm that the source will not exceed the air quality standard prior to: installing any new process that emits PM₁₀, increasing emission rates from existing units, or making changes to the stack configuration or gas flow that would reduce the dispersion of the emissions.

The results of an **updated air quality analysis** must be submitted to DNR along with the annual permit compliance certification due on **March 1**.

- Learn more about the air dispersion modeling process in the fact sheet [SB-116](#), or
- Refer to the explanation under Part II,
 - Question 9 in the Application Guide for either [Type A ROP](#) or [Type B ROP](#);
 - or Question 8 in the Application Guide for [Type G ROP](#).

Fugitive dust

“Fugitive dust” is a term describing PM emissions released through means other than a stack, duct or vent. Any facility creating sufficient dust, smoke, or fumes to be a noticeable source of air pollution must control those emissions.

- Learn more about control options and when a [fugitive dust control plan](#) is required.
- Example of a [fugitive dust control plan](#).

Visible emissions

Any facility with air pollution may, under the right circumstances, have visible emissions, for example dust from roads, smoke from burning fuels or welding fumes. In most situations, visible emissions must be less than 20% opacity.

- U.S. EPA **Method 9** is the most frequent method used for measuring visual opacity; learn more here: <https://www.epa.gov/emc/method-9-visual-opacity>.
- Method 22 may be used to demonstrate presence or absence of visible emissions: <https://www.epa.gov/emc/method-22-visual-determination-fugitive-emissions>.
- Chapters [NR 431](#) and [NR 439](#) have specific visible emission limitations and monitoring requirements, respectively.

Keep Facility Contacts Up to Date

To receive these and other communications from DNR, it is important to maintain current contact information for facility roles within the Air Reporting System.

- To update the Responsible Official information, follow the instructions on [Notifying the Air Program about Facility Changes](#) webpage.
- For all **other air contacts**, facilities can update **any new information** (Name, Title, Phone, Email, etc.) through the [DNR Switchboard](#).
- Consider **creating a dedicated e-mail address** like EHS@xyzcompany.com or Compliance@xyzcompany.com or some type of group email that allow multiple people to access the messages. This can help ensure the company receives regulatory information, billing, and other notifications when staffing changes occur.

Questions

- Questions about **compliance requirements** can be directed to the air compliance inspector. Use the [air permit search tool](#) to find your facility, then under “DNR Air Contacts,” look for the staff listed as “DNR Compliance Engineer.”
- **General questions about ROPs** can be directed to the [Registration Program Coordinator](#).
- **Other questions** can be directed to the SBEAP at DNRSsmallbusiness@wisconsin.gov or 855-889-3021.