

DATE: December 16, 2019

SUBJECT: Reminders for 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.

Calculating actual emissions

At the end of the calendar year, or at the end of each month for ROP-Type B sources, a ROP facility must **calculate the actual emissions** for the appropriate time period and show continued compliance with the ROP.

- To demonstrate **compliance with the ROP emission limits**, use the collection efficiency allowed by the permit for the appropriate control device (see Section G of each ROP).
- To determine whether the facility is **required to report annual emissions** under the Air Emissions Inventory (see email sent in February), use the measured/demonstrated collection efficiency of the device.
 - The following spreadsheet may help facilities with actual emissions calculations: <http://dnr.wi.gov/topic/SmallBusiness/documents/air/ActualEmissionsWorksheet.xls>.

Records when exempt from a requirement

Facilities covered by a ROP are required to understand which rules in NR 400-499 apply to their operations. Most rules have an applicability or exemption threshold. If a ROP facility is exempt from a requirement, the facility must **maintain records to demonstrate** that the facility is below these thresholds at all times it is in operation.

- Learn more about good record keeping practices: <http://dnr.wi.gov/files/PDF/pubs/sb/sb118.pdf>.
- Use this spreadsheet **if a facility needs help calculating monthly volatile organic compound (VOC) emissions** to demonstrate their emissions are below a regulatory exemption: <http://dnr.wi.gov/topic/SmallBusiness/documents/air/MonthlyVOCemissions.xls>
 - Learn how to find the right **information on a Safety Data Sheet** to calculate VOC emissions: <http://dnr.wi.gov/files/PDF/pubs/sb/sb112.pdf>

LACT requirements

A facility with an **organic process line** having VOC emissions that are **more than 15 pounds per day** must either control emissions by 85 percent or demonstrate **Lowest Achievable Control Techniques** and operating practices (LACT). Ordinarily, LACT is a site-specific determination and conditions established by DNR are included in a facility's permit. Instead of individual determinations, the ROP includes an emissions cap on **each organic process line of 10 tons of VOC** per year.

- To use the ROP LACT, keep records of VOC emissions from **each organic process line** to demonstrate compliance with the emissions cap.
- For an explanation of LACT requirements, review information under Part II, Number 1 in the [ROP A](#) or [ROP B](#) Application Guides.
- The organic process rule is explained in more detail here: <http://dnr.wi.gov/files/PDF/pubs/am/AM478.pdf>.

To receive these and other communications from DNR, it is important to **maintain current contact information** for facility roles within the Air Reporting System. A tutorial on updating ARS Facility Contact is available at: <http://dnr.wi.gov/topic/AirEmissions/Tutorials.html>.

Any questions about Air Pollution Control Registration Permits can be directed to the Registration Program Coordinator at DNRAMROPSAIRPERMIT@wisconsin.gov.

Other questions can be directed to the SBEAP at DNRsmallbusiness@wisconsin.gov or 855-889-3021.

