

Date: December 2, 2020

Subject: Reminders for facilities covered by a Registration Operation 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. Copies of this and previous reminder emails are available online in PDF format: <https://dnr.wi.gov/topic/AirPermits/Registration.html#tabx5>.

Calculating actual emissions

Facilities must calculate actual emissions for two different purposes; one is to demonstrate compliance with air permit limits and the other is for reporting to the air emissions inventory. At the end of the calendar year, or at the end of each month for ROP Types B and G sources, the facility must **calculate the actual emissions** for the appropriate time period and show continued compliance with the ROP. There are distinct differences in the two calculations:

- 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).
 - Emission units listed in Attachment 1 of ROP Types A, B and G or Attachment 3 of ROP Type C are not required to be included in the calculations used to demonstrate compliance with the ROP emission limits.
- To **calculate the annual emissions** for the annual Air Emissions Inventory, use the measured/demonstrated collection efficiency of the device.
 - All emission units shall be included in the inventory of annual air emissions, including fugitive dust emissions and emissions from units listed in Attachment 1 of ROP Types A, B and G or Attachment 3 of ROP Type C.

For assistance with actual emissions calculations, SBEAP provides example calculations: <https://dnr.wi.gov/topic/SmallBusiness/documents/air/ActualEmissionsWorksheet.xlsx>.

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, they must **maintain records to demonstrate** that the facility is below the threshold at all times.

- Learn more about good record keeping practices: <https://dnr.wi.gov/files/PDF/pubs/sb/sb118.pdf>.
- Use a spreadsheet for **calculating monthly volatile organic compound (VOC)** emissions to demonstrate emissions are below a regulatory exemption. One example is provided by SBEAP: <https://dnr.wi.gov/topic/SmallBusiness/documents/air/MonthlyVOCemissions.xlsx>
- Find the information needed on a **Safety Data Sheet to calculate VOC** emissions: <https://dnr.wi.gov/files/PDF/pubs/sb/sb112.pdf>

Malfunction prevention and abatement plan

Each facility with a direct or portable source that may emit any amount of hazardous air pollutants or emits more than 15 pounds a day or three pounds an hour of any air contaminant with an emission limit must prepare a **Malfunction Prevention and Abatement Plan** to ensure the emission limit is met during any malfunction of the equipment.

- Review the rule in [s. NR 439.11](#), Wis. Adm. Code, for details on what to include in the plan.
- Find example plans here: https://dnr.wi.gov/cias/guidance/guidanceexternal/GuidanceItem.aspx?item_seq_no=2349

Federal standards

When a source is affected by a federal New Source Performance Standard (NSPS) or National Emission Standard for Hazardous Air Pollutants (NESHAP) allowed under the ROP, the **facility is responsible** for understanding and demonstrating compliance with the rule.

- Learn if a rule affects the facility:
 - Review **lists of the NESHAP and NSPS** categories on the U.S. Environmental Protection Agency's (U.S. EPA) website to determine whether a category fits the facility's operations:
 - NESHAP: <https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-9>
 - NSPS: <https://www.epa.gov/stationary-sources-air-pollution/new-source-performance-standards>
 - U.S. EPA created **compliance guides** for many of the NESHAP categories. Each rule has its own set of webpages accessible from the lists above.
 - **Before each new construction project** that could make the facility subject to a federal standard, contact DNR to confirm that this standard is allowed under the ROP.
- If affected by a rule, some tips on demonstrating compliance:
 - Include examples of how the facility is complying in the annual monitoring summary report. There are tips in the Application Guides for Questions 4 and 5 of [ROP A](#), [ROP B](#) and [ROP G](#). Also in the Monitoring Summary & Compliance Checklist, [form 4530-179](#).
 - Some federal standards require initial notifications and compliance certifications to be sent to U.S. EPA. Review information at <https://dnr.wi.gov/topic/AirQuality/HAPFAQ.html> to determine where to send the certifications.

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.

- Update the **Responsible Official** information according to the instructions here: <https://dnr.wi.gov/topic/AirPermits/Changes.html>.
- Update all **other air contacts** by sending an email to [Grant Hetherington](#) with **any new information**: name, title, email, phone and mailing address.
- 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

- Direct questions about **compliance requirements** to the air compliance inspector. Use the air permit search tool to find the facility: https://dnr.wi.gov/cias/am/amexternal/AM_PermitTrackingSearch.aspx, then under "DNR Air Contacts," look for the staff listed as "DNR Compliance Engineer."
- Direct **general questions about ROPs** to the [Registration Program Coordinator](#).
- **Other questions** can be directed to the SBEAP at DNRsmallbusiness@wisconsin.gov or 855-889-3021.