Date: February 1, 2021

SUBJECT: Reminders for facilities covered by a Registration Operation Permit

Dear Registration Operation Permit holder:

Your facility's 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 service 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.

This email is provided as a general resource for facility contacts; if these reports have been filed, then no further action is required.

# Air Emissions Inventory – due March 1

All facilities covered by a ROP must submit an annual Air Emissions Inventory (AEI) report or an Under-Threshold Notification (UTN):

- All emission units shall be included in the AEI, including insignificant units and fugitive dust emissions.
- Businesses with air emissions below the reporting thresholds listed on Table 1 of Chapter NR 438, should submit an UTN to notify DNR their air emissions are below reporting levels. The UTN should be generated and submitted electronically within the Air Reporting System (ARS).

Resources to help with submitting the AEI or UTN can be found at https://dnr.wisconsin.gov/topic/AirEmissions/Tutorials.html. For direct assistance, contact Grant Hetherington at 608-266-1552.

#### Annual permit compliance certification and annual summary of monitoring – due March 1

Facilities covered by a ROP must submit an annual summary of monitoring and a compliance certification to DNR for each calendar year's operations. The ROP-C revised in September 2020 has the deadline of March 1 now; the date applies to all ROP-C facilities.

These reports shall include enough information to determine the compliance status of the source with each applicable permit condition.

- DNR developed the Annual Compliance Certification form (Form 4530-178) for facilities covered by a ROP, which also serves as the annual summary of monitoring report. Use of this form is not mandatory, however, any report submitted by the facility must meet the requirements discussed above.
- The report can be submitted and signed electronically; follow the instructions under "Electronic reporting" below. If the facility uses their own format, all documents should be combined and submitted as a single
- The responsible official is required to certify whether compliance was continuous or intermittent for each condition. All deviations from, and violations of, any requirement shall be identified in the report.
- Additional assistance determining compliance, including examples and links to resources, can be found in Form 4530-179. This form is not required to be submitted to DNR and is not a substitute for Form 4530-178.

**NOTE**: Forms 4530-178 and 4530-179 only open in **Internet Explorer** (2).



# **Electronic reporting options**

Online reporting options streamline the process through use of the DNR Switchboard and Air Reporting System. The electronic signature for reports is only available to the facility's responsible official.

The facility's responsible official, air management contact and/or delegated party must obtain a Web Access Management System (WAMS) ID to access the **DNR Switchboard**.

- Next, facility contacts need to <u>request access</u> to the compliance and air emission inventory roles in order to file reports electronically.
- Learn about all electronic submittal options at: <a href="https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html">https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html</a>.

### **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 here: <a href="https://dnr.wi.gov/topic/AirPermits/Changes.html">https://dnr.wi.gov/topic/AirPermits/Changes.html</a>.
- For all **other air contacts**, email **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.

#### **Ouestions**

- Questions about compliance requirements can be directed to the air compliance inspector. Use the air permit search tool to find your facility:
  <a href="https://dnr.wi.gov/cias/am/amexternal/AM\_PermitTrackingSearch.aspx">https://dnr.wi.gov/cias/am/amexternal/AM\_PermitTrackingSearch.aspx</a>, then under "DNR Air Contacts," look for the staff listed as "Air Compliance Inspector."
- **General questions about ROPs** 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.