

DATE: May 20, 2019

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. This email is provided as a general resource for facility contacts; if you have already filed reports or maintained the recommended records or plans, **then no further action is required.**

Air Emissions Inventory certification – due June 30

Facilities submitting an annual Air Emissions Inventory report must certify the report after DNR air compliance staff have completed a review of the data. Learn more about the final report certification for the Air Emissions Inventory: <http://dnr.wi.gov/files/PDF/pubs/am/AM529.pdf>. This requirement does not apply to facilities who have notified the DNR that their emissions were below reporting thresholds by completing the UTN or facilities that completed the Air Emissions Inventory report but the emissions were below reporting levels.

Note that the Air Emissions Inventory certification is NOT the same as the Annual Compliance Certification which was due on March 1, 2019.

Maintain records

The facility is responsible for maintaining all records necessary to demonstrate compliance or continued eligibility with the ROP.

- Records must be maintained for at least five years.
- Records might include information such as monthly material usage, calibration of monitoring equipment, control device monitoring logs or a one-time documentation of stack parameters (i.e., height, diameter).
- Regardless of format or storage location, all records must be made available to DNR staff upon request and within a reasonable time period.
- Learn more about good record keeping practices: <http://dnr.wi.gov/files/PDF/pubs/sb/sb118.pdf>.

Modeling before construction to show eligibility

A facility that provided air dispersion modeling results to demonstrate initial eligibility for the ROP must demonstrate continuing eligibility for each new construction project through updated air dispersion modeling results. A facility should also conduct an air dispersion modeling analysis and provide the results if the air emissions have increased above modeling thresholds.

- Learn more about the air dispersion modeling process in this fact sheet <http://dnr.wi.gov/files/PDF/pubs/sb/sb116.pdf>, or
- Refer to the explanation under Part II, Number 9 in either Application Guide:
 - <http://dnr.wi.gov/files/PDF/pubs/am/AM539.pdf> for Type A ROP, or
 - <http://dnr.wi.gov/files/PDF/pubs/am/AM546.pdf> for Type B ROP.

Fugitive dust

“Fugitive dust” is a term describing particulate matter (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: <http://dnr.wi.gov/files/PDF/pubs/am/am556.pdf>.
- Here is an example of a fugitive dust control plan: https://dnr.wi.gov/cias/guidance/guidanceexternal/FileView.aspx?OBJECT_SEQ_NO=15833.

Malodorous emissions

Certain chemical compounds have low detection thresholds which means their odor can be perceived by humans at very low concentrations. A human’s sensitivity to a specific smell differs from person to person and some odors could cause discomfort to a portion of the population. The DNR frequently receives odor complaints, and facilities are required to address these complaints. In order to simplify the facility’s response to an odor complaint, and to document their efforts to control odors, DNR recommends having in place an Odor Control Plan.

- Malodorous emissions control regulations can be found at: http://docs.legis.wisconsin.gov/code/admin_code/nr/400/429.
- For information about controlling odors: <https://dnr.wi.gov/files/PDF/pubs/am/AM462.pdf>.
- Learn more about the odor control in biosolids management: <https://www.epa.gov/sites/production/files/2018-11/documents/order-control-biosolids-management-factsheet.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>. Consider creating a dedicated e-mail address like EHS@xyzcompany.com or Compliance@xyzcompany.com for DNR correspondence. Topical group emails that allow multiple people to access the messages can help ensure your company continues to receive regulatory information, billings and other notifications when staffing changes occur.

Any questions about Registration Permits can be directed to the Registration Permit Coordinator at DNRAMROPSAIRPERMIT@wisconsin.gov.

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