

Date: May 26, 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>.

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 certification – due June 30

Facilities submitting an annual Air Emissions Inventory (AEI) report must certify the report after DNR air compliance staff complete a review of the data.

- Learn more about the final report certification for the AEI:
<https://dnr.wi.gov/files/PDF/pubs/am/AM529.pdf>.
- This certification is not required for facilities completing the **Under Threshold Notification (UTN)** or facilities that completed the AEI but had emissions below reporting levels in NR 438.

Note that the AEI certification is NOT the same as the Annual Permit Compliance Certification which was due on March 1.

Reporting deviations – due next business day

Facilities are required (s. NR 439.03(4), Wis. Adm. Code) to **report any deviation** from permit requirements **by the next business day**. Deviations may include certain malfunctions or other unscheduled events (e.g. accidental release of pollutants) at the source that were not reported in advance.

- Use this DNR form in these situations: <https://dnr.wi.gov/files/PDF/forms/4500/4530-182.pdf>
- Two examples, are provided: <https://dnr.wi.gov/topic/AirPermits/documents/4530-182Example1.pdf>;
<https://dnr.wi.gov/topic/AirPermits/documents/4530-182Example2.pdf>.
- **NOTE:** Form 4530-182 only opens in **Internet Explorer** .

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: <https://dnr.wi.gov/files/PDF/pubs/sb/sb118.pdf>.

Stack testing

Testing the amount of emissions from exhaust stacks is one method DNR uses to determine if a facility is meeting requirements. Some sections of the Wisconsin Administrative Code require periodic testing, which could be annual, biennial or every five years.

- Learn more about what to do when DNR requires a stack test:
<https://dnr.wi.gov/files/PDF/pubs/sb/sb119.pdf>.

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 an Odor Control Plan.

- Malodorous emissions control regulations can be found at: https://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>.

Contacts

To receive these and other communications from DNR, it is important to **maintain current contact information** for facility roles within the ARS. Contact [Grant Heatherington](#) via email with any new contact name, title, email, phone and mailing address. Consider creating a dedicated e-mail address like EHS@xyzcompany.com or Compliance@xyzcompany.com for DNR correspondence. Group emails that allow multiple people to access the messages can help ensure your 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: https://dnr.wi.gov/cias/am/amexternal/AM_PermitTrackingSearch.aspx, then under "DNR Air Contacts," look for the staff listed as "Air Compliance Inspector."
- General questions about **Registration Operation 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.

