Date: May 24, 2021

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 on the Registration Permit webpage, [Compliance Resources tab](#).

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 in [AM-529](#).
- 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.

Facility Expansions
Registration permits allow a facility to add new equipment or make operational changes without having to undergo additional air permitting. However, if a facility plans to expand operations outside the current property or to a building that was previously determined to be a separate operation on the same property or nearby, the plans should be discussed with the **assigned DNR air compliance engineer** before submitting an application. The department will make a determination of whether or not the operations in off-property locations or separate buildings can be covered by the same permit.
- Use the [air permit search tool](#) to find your facility, then under "DNR Air Contacts," look for the staff listed as "DNR Compliance Engineer."

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 in "[Recordkeeping: What's Involved and Why It's Important (SB-118)](#).

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 in ["Stack Testing Requirements" (SB-119)](#).

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 are in NR 429, Wis. Adm. Code.
- For information about controlling odors review Small Business publication SB-110.
- Learn more about the odor control in biosolids management from a U.S. EPA factsheet.

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 on Notifying the Air Program about Facility Changes webpage.
- For all **other air contacts**, facilities can update **any new information** (Name, Title, Phone, Email, etc.) through the DNR Switchboard.
- 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?
- Questions about **compliance requirements** can be directed to the DNR compliance engineer. Use the air permit search tool to find your facility, then under "DNR Air Contacts," look for the staff listed as "DNR Compliance Engineer."
- General questions about **Registration Operation Permits** can be directed by email to the Registration Program Coordinator.
- **Other questions** can be directed to the SBEAP at DNRsmallbusiness@wisconsin.gov or 855-889-3021.