

DATE: September 14, 2020

Subject: Reminders for Primarily PM Emitting Facilities Covered by a Registration 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>.

### **PM emission limits for processes**

Emissions of particulate matter (PM) are regulated in chapter [NR 415](#) of the Wisconsin Administrative Code. The following activities have specific limits on PM:

- General processes emitting PM have limits determined by the process weight equation in s. NR 415.05(2), or source specific limits in s. NR 415.05(1).
  - Asphalt, concrete or aggregate mix plants, grain processing, grinding, drying, mixing, conveying, sizing or blending are processes with specific limits in NR 415.05(1).
- Crushed stone, sand and gravel plants, ledge rock quarries and industrial mines have limits in NR 415.075 or 415.076.
- Fuel combustion sources such as boilers and heaters have limits in NR 415.06 based on the heat input capacity.

Stationary gasoline or diesel engines have a limit of 0.50 pounds of PM per million BTU heat input under NR 485.055.

### **PM modeling requirements**

Facilities emitting PM<sub>10</sub> (particulate matter less than 10 microns in size) must protect air quality standards. In general, any facility that can emit more than **5 tons of PM<sub>10</sub> per year** must confirm that the source will not exceed the air quality standard prior to: installing any new process that emits PM<sub>10</sub>, increasing emission rates from existing units, or making changes to the stack configuration or gas flow that would reduce the dispersion of the emissions.

The results of an **updated air quality analysis** must be submitted to DNR along with the annual permit compliance certification due on **March 1**.

- Learn more about the air dispersion modeling process in this fact sheet <https://dnr.wi.gov/files/PDF/pubs/sb/sb116.pdf>, or
- Refer to the explanation under Part II, Question 9 in either application guide:
  - <https://dnr.wi.gov/files/PDF/pubs/am/AM539.pdf> for Type A ROP,
  - <https://dnr.wi.gov/files/PDF/pubs/am/AM546.pdf> for Type B ROP;
  - or Question 8 in the Application Guide <https://dnr.wi.gov/files/PDF/pubs/am/AM569.pdf> for Type G ROP.

### **Fugitive dust**

“Fugitive dust” is a term describing 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: <https://dnr.wi.gov/files/PDF/pubs/am/am556.pdf>.
- Example of a fugitive dust control plan: [https://dnr.wi.gov/cias/guidance/guidanceexternal/FileView.aspx?OBJECT\\_SEQ\\_NO=15833](https://dnr.wi.gov/cias/guidance/guidanceexternal/FileView.aspx?OBJECT_SEQ_NO=15833).

### **Visible emissions**

Any facility with air pollution may, under the right circumstances, have visible emissions, for example dust from roads, smoke from burning fuels or welding fumes. In most situations, visible emissions must be less than 20% opacity.

- U.S. EPA **Method 9** is the most frequent method used for measuring visual opacity; learn more here: <https://www.epa.gov/emc/method-9-visual-opacity>.
- Method 22 may be used to demonstrate presence or absence of visible emissions: <https://www.epa.gov/emc/method-22-visual-determination-fugitive-emissions>.
- Chapters [NR 431](#) and [NR 439](#) have specific visible emission limitations and monitoring requirements, respectively.

### 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: <https://dnr.wi.gov/topic/AirPermits/Changes.html>.
- 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.

### 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](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 ROPs** can be directed to the Registration Program Coordinator at [DNRAMROPSAIRPERMIT@wisconsin.gov](mailto:DNRAMROPSAIRPERMIT@wisconsin.gov).
- **Other questions** can be directed to the SBEAP at [DNRsmallbusiness@wisconsin.gov](mailto:DNRsmallbusiness@wisconsin.gov) or 855-889-3021.