

DATE: September 14, 2020

Subject: Reminders for Primarily VOC 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>.

### **Volatile Organic Compounds (VOC) control requirements**

Any facility that emits VOC from materials such as coatings, solvents or mixtures, is responsible for proper handling of materials by taking precautions to prevent spills or other releases to the environment. Also, facilities subject to any section in chapters NR 421 to NR 423 of the Wisconsin Administrative Code shall meet those requirements. See **RACT applicability** below for more details.

Facilities that are not subject to any section in chapters NR 421 to NR 423 but operate a process line with organic compound emissions greater than 15 pounds per day, or greater than 30 pounds per day if sprayed in an enclosed booth, must control emissions by meeting one of the following:

- Apply 85% overall control of organic compounds by using air pollution control devices.
- Adopt the **Lowest Achievable Control Techniques** and operating practices (**LACT**) conditions included in the Registration Permit (more details included below).
- If operating a surface coating or printing process, the facility can adopt the control requirements in any section from NR 422.05 to 422.155.

### **RACT applicability**

Activities regulated in chapters NR 421 to NR 423 of the Wisconsin Administrative Code can include surface coating operations, printing, manufacturing of chemicals, coating and rubber products, and solvent cleaning operations ([https://docs.legis.wisconsin.gov/code/admin\\_code/nr/400](https://docs.legis.wisconsin.gov/code/admin_code/nr/400)). These regulations, also known as Reasonably Available Control Technology or RACT, require process specific VOC controls or emission limits. Some of these regulations only apply in certain counties.

- Learn more about RACT applicability here: <https://dnr.wi.gov/topic/SmallBusiness/Resources/Painting.html>.
- For questions on RACT rules, contact the Registration Permit Coordinator.

### **LACT requirements**

A facility with a **process line** emitting **more than 15 pounds per day of VOC** must either control emissions by 85 percent or demonstrate LACT. Ordinarily, LACT is a site-specific determination and conditions established by DNR are included in a facility's permit. Instead of individual determinations, the ROP includes an emissions cap on **each organic process line of 10 tons of VOC** per year.

- To use the ROP LACT, keep records of VOC emissions from **each organic process line** to demonstrate compliance with the emissions cap.
- For an explanation of LACT requirements, review information under Part II, Question 1 in the [ROP A](#) or [ROP B](#) application guides.
- The organic compound rule is explained in more detail here: <https://dnr.wi.gov/files/PDF/pubs/am/AM478.pdf>.

### **Recordkeeping requirements**

A facility that emits VOC shall maintain records that demonstrate compliance with applicable emission limitations and operating requirements. Any facility claiming to be exempt from an emission limitation or other requirement shall maintain records adequate to support each exemption claim. The following records are typically required:

- name of material/product/solvent,
- VOC content in pounds VOC per gallon, or grams VOC per liter, as found on Safety Data Sheet (SDS) or Product/Technical Data Sheet from supplier,
- amount of material used each day, in pounds or gallons,

- monitoring data from any control device,
- maintenance log of any control device.

The Registration Permits and section [NR 439.04](#) of the Wisconsin Administrative Code contain specific recordkeeping requirements.

### **Calibration of monitoring equipment**

All instruments used for measuring equipment operational variables (e.g., pressure drop, temperature, air flow) shall be **calibrated annually** or at a frequency based on good engineering practice as established by operational history, whichever is more frequent. Calibration records shall be retained for a period of **5 years** or for such other period as may be specified by the department.

- Data transmitters should be calibrated.
- Thermocouple replacement can substitute for calibration of the device.
- Equipment inspections, maintenance and calibration schedule shall be included in a Malfunction Prevention and Abatement Plan (s. NR 439.11, Wis Adm. Code).

### **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](mailto:Grant.Hetherington@dnr.wisconsin.gov) 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.