

APII Fact Sheet 1

Registration Operation Permits

WHAT IS A REGISTRATION OPERATION PERMIT (ROP)?

A ROP is a new, standardized operation permit for use by facilities with low actual emissions. These new permits will be available in the fall of 2005 for facilities that do not have an existing facility-wide operation permit. Facilities that have an existing facility-wide operation permit may apply for a ROP beginning in July 2006.

WHAT ARE THE BENEFITS OF A ROP?

- Flexibility to construct, modify, or replace equipment without obtaining a construction permit as long as the facility continues to comply with all conditions of the ROP after the change.
- Less frequent and less prescriptive monitoring and recordkeeping requirements.
- Swift DNR permit issuance—15 days.
- Simplified permit applications and permitting process.
- Lower administrative costs—no permit renewals or revisions.

WHO CAN GET ONE?

- Facilities whose actual emissions are, and will continue to be, less than 25% of the major source thresholds (except for lead emissions, which will be limited to 0.5 tons per year). Table 1 contains the eligibility thresholds for ROPs in Wisconsin.

Table 1: Registration Operation Permit Thresholds*

Pollutant	Actual Emissions
Particulate Matter or PM10	• 25 tons/year for attainment areas
Volatile Organic Compounds	• 25 tons/year for attainment and marginal or moderate nonattainment areas
Nitrogen Oxides	• 25 tons/year
Sulfur Dioxide	• 25 tons/year
Carbon Monoxide	• 25 tons/year for attainment and moderate nonattainment areas
Lead	• 0.5 tons/year
Section 112(b) Hazardous Air Pollutants	• 2.5 tons/year for any single pollutant • 6.25 tons/year for a combination of all pollutants

* The emission levels associated with 25% of major source threshold may change if an attainment area is designated as nonattainment or if a nonattainment area has its classification changed.

OTHER ELIGIBILITY CRITERIA:

- All stacks, except those for insignificant emission units¹ must have vertical, unobstructed exhaust points.²
- All stacks, except those for insignificant emission units¹ must be at least as tall as surrounding buildings that have the potential to significantly reduce the dispersion of the emissions from the stack.³
- Pollution control devices at the facility must have control efficiencies equal to, or greater than, the efficiencies in the ROP.⁴

(continued on next page)

¹ See Table 2 on page 3 for a list of insignificant emission units.

² As an alternative to this condition, a facility can model its emissions to demonstrate compliance with all air quality standards.

³ A building is considered to reduce the dispersion of emissions from a stack if the stack is located within a circle around the building, the radius of which is 5 times the height of the building.

⁴ See Table 3 on page 3 for a listing of the ROP pollution control device efficiencies.



- Facility cannot be subject to any NSPS or MACT standards, other than those specifically listed in Table 4.
- Facility cannot be subject to any air pollution requirement that requires a case-by-case determination by the department, other than NR 424 latest available control techniques (LACT). Examples include NR 445 best available control technology (BACT) or lowest achievable emission rate (LAER).
- A facility's existing permits must be revocable by the department. For many businesses, this will be possible.

WHAT REQUIREMENTS ARE IN THE PERMIT?

- Facility emissions may not exceed the thresholds in Table 1.
- Annual recordkeeping of production/usage data necessary to calculate emissions.
- Operation and maintenance of all air pollution control devices and associated monitoring equipment.
- Recordkeeping requirements for pollution control device operating parameters.
- "Generic" LACT (s. NR 424.03(2)(c), Wis. Adm. Code) requirements.
- Must meet all other state (NR 400 – NR 499) and federal air pollution requirements that apply to the facility.
- Facility must submit annual compliance certification/monitoring report and report emissions to the air emission inventory (AEI) each year.

IS THERE A DOWNSIDE TO A ROP?

- Yes. The ROP does not list the federal and state air pollution requirements that apply to a facility. It is up to the permitted facility to determine what these are. However, DNR will have tools available via its website and also hold workshops to help facilities determine what their applicable requirements are and how to comply with them.

NEXT STEPS

- DNR will develop a list of facilities that may be eligible and contact them around October, 2005 with information on specific application procedures.
- Interested facilities may also notify their DNR permit writer or compliance inspector of their interest in a ROP and request that the DNR review their existing permits to ensure that the permits can be revoked.⁵ DNR will notify each facility if all of its permits can be revoked. If they cannot be revoked, the facility is not eligible for a ROP and DNR will proceed with a traditional permit review.
- Facilities may apply for a ROP beginning in October or early November, 2005.
- DNR has 15 days to review each application and either grant or deny coverage or ask for more information.

⁵ A list of DNR Air staff is available at: <http://www.dnr.state.wi.us/org/law/air/staff/amstaffdir.pdf>



Table 2: Insignificant Emission Units

- Convenience space heating units with heat input capacity of less than 5 million BTU per hour that burn gaseous fuels, liquid fuels, or wood
- Convenience water heating
- Boiler, turbine, generator, heating and air conditioning maintenance
- Demineralization and oxygen scavenging of water for boilers
- Pollution control equipment maintenance
- Fire control equipment
- Office activities
- Janitorial activities
- Fuel oil storage tanks with a capacity of 10,000 gallons or less
- Purging of natural gas lines
- Maintenance of grounds, equipment and buildings, including lawn care, pest control, grinding, cutting, welding, painting, woodworking, general repairs and cleaning, but not including use of organic compounds as clean-up solvents
- Internal combustion engines used for warehousing and material transport, forklifts and courier vehicles, front end loaders, graders and trucks, carts and maintenance trucks
- Stockpiled contaminated soils

Table 3: Air Pollution Control Device Efficiencies

Control Device	Control Efficiency (Total Enclosure)*			Control Efficiency (Hood)		
	PM	PM ₁₀ and PHAP	VOC and VHAP	PM	PM ₁₀ and PHAP	VOC and VHAP
Low efficiency cyclone	40%	20%	—	32%	16%	—
Medium efficiency cyclone	60%	40%	—	48%	32%	—
High efficiency cyclone	80%	60%	—	64%	48%	—
Multiple cyclone w/out fly ash reinjection	80%	60%	—	64%	48%	—
Multiple cyclone with fly ash reinjection	50%	38%	—	40%	30%	—
Wet cyclone separator	50%	38%	—	40%	30%	—
HEPA and other wall filters (including paint overspray filters)	95%	95%	—	76%	76%	—
Fabric filters (e.g., baghouse, cartridge collectors)	98%	92%	—	78%	73%	—
Spray towers	80%	80%	70%	64%	64%	56%
Venturi scrubber	90%	85%	—	72%	68%	—
Condensation scrubber (packed bed)	90%	90%	—	72%	72%	—
Impingement plate scrubber	75%	75%	—	60%	60%	—
Electrostatic precipitators	95%	95%	—	76%	76%	—
Thermal oxidizers	—	—	95%	—	—	76%
Catalytic oxidizers	—	—	95%	—	—	76%
Condenser	—	—	70%	—	—	56%
Flaring or direct combustor	—	—	98%	—	—	78%
Biofiltration	—	—	80%	—	—	64%

* VHAP = Volatile hazardous air pollutant, PHAP = Particulate hazardous air pollutant



Table 4: Facilities subject to New Source Performance Standards (NSPS) or Maximum Achievable Control Technology (MACT) standards, other than those listed below, are NOT eligible for a ROP.

• Small Industrial-Commercial-Institutional Steam Generating Units (s. NR 440.207, Wis. Adm. Code)
• Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (s. NR 440.27, Wis. Adm. Code)
• Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 (s. NR 440.28, Wis. Adm. Code)
• Volatile Organic Liquid Storage Vessels (Including Petroleum Storage Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984 (s. NR 440.285, Wis. Adm. Code)
• Grain Elevators (s. NR 440.47, Wis. Adm. Code)
• Surface Coating of Metal Furniture (s. NR 440.48, Wis. Adm. Code)
• Industrial Surface Coating: Large Appliances (s. NR 440.57, Wis. Adm. Code)
• Petroleum Dry Cleaners (s. NR 440.68, Wis. Adm. Code)
• Nonmetallic Mineral Processors (s. NR 440.688, Wis. Adm. Code)
• Industrial Surface Coating of Plastic Parts for Business Machines (s. NR 440.72, Wis. Adm. Code)
• Hot Mix Asphalt Facilities (s. NR 440.25, Wis. Adm. Code)

FOR MORE INFORMATION

- For more information on ROPs and to download this fact sheet, see: <http://www.dnr.state.wi.us/org/law/air/apii/regpermits.html>
- To learn more about the entire APII effort, see: <http://www.dnr.state.wi.us/org/law/air/apii/>

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