

Fact Sheet 1

Type A Registration Permits

April 2010

WHAT IS A REGISTRATION PERMIT?

A Registration Permit is a standardized operation permit for use by facilities with low actual air pollution emissions. This type of permit is drafted, undergoes public comment, and is issued to cover a category of air pollution sources. Upon issuance, eligible facilities may apply for coverage under the Registration Permit.

WHAT ARE THE BENEFITS OF A REGISTRATION PERMIT?

- 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 Registration Permit after the change.
- Less frequent and less prescriptive monitoring and recordkeeping requirements.
- Swift DNR decisions on permit coverage—15 days or less.
- Simplified permit application process.
- Lower administrative costs—no construction permits, renewals or revisions.

WHO CAN GET ONE?

Facilities whose actual emissions are, and will continue to be, less than 25% of the major source thresholds¹ (except for lead emissions, which will be limited to 0.5 tons per year).

Table 1 - Eligibility Thresholds for Type A Registration Permits in Wisconsin	
Pollutant	Actual Emissions
Particulate Matter	• 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

OTHER ELIGIBILITY CRITERIA:

- All stacks, except those for general building ventilation and insignificant emission units,² must have vertical unobstructed exhaust points³.
- All stacks, except those for insignificant emission units, must be at least as tall as surrounding buildings that have the potential to significantly reduce the dispersion of the emissions from the stack⁴.
- Regardless of stack configuration, facilities that emit 5 tons of particulate matter per year or more will need to undergo air quality modeling to ensure that the 24-hour standards for particulate matter can be met. DNR will perform this modeling for facilities that meet the above eligibility criteria for all their stacks.

¹ 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.

² See Table 2 on page 3 for a list of emission units not subject to the stack requirements.

³ As an alternative to this condition, a facility can model its emissions to demonstrate compliance with all air quality standards. Modeling results must be submitted with the hard copy of the Registration Permit application.

⁴ 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.

- Pollution control devices at the facility must have control efficiencies equal to or greater than the efficiencies in the Registration Permit⁵.
- Facility cannot be subject to any New Source Performance Standard or National Emissions Standard for Hazardous Air Pollutants, other than those specifically listed in Table 4.
- Facility cannot need a case-by-case determination under ch. NR 445, best available control technology (BACT) or lowest achievable emission rate (LAER).
- A facility's existing permit(s) must be revocable by the department. For most 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.
- A requirement to meet all other state (ch. 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 as required by ch. NR 438.

IS THERE A DOWNSIDE TO A REGISTRATION PERMIT?

Yes. The Registration Permit 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. The Department of Commerce's Small Business Clean Air Assistance Program has materials that can help facilities determine what their applicable requirements are and how to comply with them. Visit their website at: <http://commerce.wi.gov/BD/BD-CA-SBCAAP.html>.

NEXT STEPS

- Interested facilities that already have air permits should first complete the Revocation Form to request that the DNR review their existing permits to ensure that the permits can be revoked. 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 Registration Permit. The Revocation Form is available at <http://dnr.wi.gov/air/permits/streamlining/regpermits.html>.
- Facilities may apply for a Registration Permit using our online application system consisting of 9 yes/no questions. Information for air quality modeling may need to be attached. The online application is available at <http://dnr.wi.gov/air/permits/streamlining/regpermits.html>.
- DNR has 15 days to review each application and either grant or deny coverage or ask for more information.

WHERE DO I GO FOR HELP?

- For more information on Registration Permits visit DNR's Registration Permit Website at: <http://dnr.wi.gov/air/permits/streamlining/regpermits.html>.
- Call or email the Registration Permit Coordinator: Kristin Hart (608)273-5605, Kristin.Hart@wisconsin.gov.
- Call or email the Regional Air Pollution Contact for your facility. A list of DNR Air Staff and Regional Service Centers is available at: <http://dnr.wi.gov/air/about/index.htm>.

⁵ See Table 3 on page 3 for a listing of the Registration Permit pollution control device efficiencies.

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
• Any emission unit, operation, or activity that has, for each air contaminant, maximum controlled emissions that are less than the level specified in Table 3 of ch. NR 407, Wis. Adm. Code. Multiple emission units, operations, or activities that perform identical or similar functions shall be combined for the purpose of this determination.
• If the maximum controlled emissions of any air contaminant listed in Table 3 of ch. NR 407, Wis. Adm. Code, from all emission units, operations or activities at a facility are less than 5 times the level specified in Table 3, for those air contaminants, any emissions unit, operation, or activity that emits only those air contaminants.

Table 3 –Control Device Efficiencies						
Control Device	Control Efficiency (Total Enclosure)			Control Efficiency (Hood)		
	PM	PM₁₀ and PHAP	VOC and VHAP	PM	PM₁₀ and PHAP	VOC and VHAP
Low efficiency cyclone	40%	20%		32%	16%	
Medium efficiency cyclone	60%	40%		48%	32%	
High efficiency cyclone	80%	64%		60%	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%	40%		38%	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%
Adsorber (activated Carbon Systems carbon adsorption, solvent recovery)			85%			68%

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

Table 4 – Allowable New Source Performance Standards (NSPS under s. 111 Clean Air Act) and National Emission Standards for Hazardous Air Pollutants (NESHAPS under s. 112 Clean Air Act)
• 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)
• 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)
• Spark ignition internal combustion engines under 40 CFR part 60 subpart JJJJ – only for manufacturer-certified affected engines at area sources
• Compression ignition internal combustion engines under 40 CFR part 60 subpart IIII only for manufacturer-certified affected engines that are 2007 model year or later with displacements less than 30 liters per cylinder.
• Hard and decorative chromium electroplating and anodizing tanks under 40 CFR part 63 subpart N – only for units that are area sources or located at area sources and which are any of the following: <ul style="list-style-type: none"> ○ Any decorative chromium electroplating operation or chromium anodizing operation that uses fume suppressants as an emission reduction technology ○ Any decorative chromium electroplating operation that uses a trivalent chromium bath that incorporates a wetting agent as a bath ingredient
• Any New Source Performance Standard (NSPS) or National Emissions Standard for Hazardous Air Pollutant (NESHAP) where the facility or process is subject to only the recordkeeping or notification requirements of that standard.
• Any area source NESHAP that controls emissions to a level considered Generally Available Control Technology (GACT).

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