

Registration Permit Compliance Checklist

Item	Frequency	Due Date	Report Required	Documents Needed	Resources/Comments
<i>The following tasks should be done by all facilities soon after receiving coverage under a Registration Permit:</i>					
Read your Registration Permit	At least once	Within 2 weeks of receipt	No	Not applicable	Coverage letter sent to Responsible Official with link to permit. Download a copy http://dnr.wi.gov/topic/AirPermits/Options.html – found on the Registration tab.
If not already on the Air Emissions Inventory, submit information using the Consolidated Reporting System to get facility on the Air Emissions Inventory	One time	Before December 31 of the year of Registration Permit coverage ¹	No	No	Establish a WAMS user ID through DNR’s electronic Switchboard: http://dnr.wi.gov/topic/switchboard/ Air Emissions Inventory Homepage: http://dnr.wi.gov/topic/airemissions/ Air Reporting System Website: http://dnr.wi.gov/topic/AirEmissions/Reporting.html Chapter NR 438 contains the air emission reporting requirements. Links to this air pollution regulation can be found: http://docs.legis.wisconsin.gov/code/admin_code/nr/400/438.pdf
Documented search of applicable requirements for safe harbor under s. NR 407.105(7), Wis. Adm. Code. Safe harbor can allow your facility some protection from enforcement.	One time	As soon after coverage under the Registration Permit as possible	No	Written record of search methods and search results required by DNR, for facility to be covered by safe harbor	If you had an old air permit, it will list all applicable air pollution requirements for the emissions units covered by the permit. DNR’s Small Business Environmental Assistance Program can help small businesses. http://dnr.wi.gov/topic/smallbusiness/ Links to current air pollution regulations can be found at: http://dnr.wi.gov/topic/AirQuality/Rules.html

¹ DNR staff adds basic information to the air emissions inventory based on the facility description. Please check this information for accuracy and add other necessary information.

Registration Permit Compliance Checklist (AM-519)
Rev. 05/18

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<p>Set up a compliance demonstration and recordkeeping plan for each applicable requirement the facility is subject to. Common items to keep records of:</p> <ul style="list-style-type: none"> • Stack parameters • Calculation methods • Material throughputs • Control device monitoring results 	<p>One time. Update as equipment or materials are added or changed</p>	<p>As soon after coverage under the Registration Permit as possible</p>	<p>No</p>	<p>It is recommended that you have a written plan for facility staff. Plan not required by DNR</p>	<p>If you had old air permits, they are a good place to start for developing a compliance and recordkeeping plan.</p> <p>DNR’s Small Business Environmental Assistance Program can help small businesses. http://dnr.wi.gov/topic/smallbusiness/</p> <p>Chapter NR 439 contains many compliance requirements. Links to this air pollution regulation can be found at: http://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf</p>
<p>Check to see if facility is in a category under Area Source NESHAPs.</p>	<p>One time</p>	<p>Each rule has specific notification and compliance dates</p>	<p>If you are subject to one of the standards, Yes</p>	<p>Initial Notification that you are subject to the Area Source NESHAPs</p> <p>Compliance Notification²</p> <p>Annual Compliance Certification (some)</p>	<p>USEPA’s toxics website has fact sheets and final rules. If your facility is in one of the listed source categories, down load the rule. Relevant information is usually in the last 3 or 4 pages of the rule. Search for “Am I subject to this Subpart?”</p> <p>https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-9</p> <p>Additional information of the initial and compliance notifications can be found here: http://dnr.wi.gov/topic/AirQuality/HAPFAQ.html</p>
<p>Make a list of the control device parameter ranges for each control device. (Facilities without control devices do not need to do this.)</p>	<p>One time. Update as equipment is added or changed</p>	<p>As soon after coverage under the Registration Permit as possible</p>	<p>No</p>	<p>Keep the list of parameter ranges on site</p>	<p>Control device parameters that must be monitored and recorded are in Condition E.8 Table 2 of the Type A and B Registration Operation Permit, or Condition E.12 of the Type C Registration Permit.</p> <p>Section NR 439.055 contains specific requirements for control device monitoring. Links to current air pollution regulations can be found at: http://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf</p>

² Initial Notification and Compliance Notifications shall be sent to the US EPA Region 5, Air and Radiation Division, 77 West Jackson Blvd., Chicago, IL 60604-3507 and some may also need to be submitted to the DNR – check <http://dnr.wi.gov/topic/AirQuality/HAPFAQ.html> for more information.

Registration Permit Compliance Checklist (AM-519)
Rev. 05/18

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Prepare a malfunction prevention and abatement plan for your equipment as required in NR 439.11.	Update every 5 years	Upon installation of new equipment	No	Keep Plans on site for review	Section NR 439.11 contains specific requirements for malfunction prevention and abatement plans. Links to this air pollution regulation can be found at: http://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf
<i>The following tasks need to be done each year so you can submit compliance certifications and annual inventory reports:</i>					
Perform compliance audit to determine compliance status with each applicable requirement	At least Annually	Prior to submitting Compliance Certification	No	Keep documents used to determine compliance	Use your facility's compliance demonstration and recordkeeping plan. DNR's Small Business Environmental Assistance Program can help small businesses http://dnr.wi.gov/topic/smallbusiness/
Calculate actual emissions ³ of PM ₁₀ , sulfur dioxide, nitrogen oxides, carbon monoxide, VOC, hazardous air pollutants, and lead.	Annually for ROP A and ROP C; Monthly for ROP B	Prior to submitting Compliance Certification	No	Keep records of data used to make calculations and samples of how calculations were made	The Registration Permit Application Guides contain information on calculating facility wide actual annual emissions. The guides are available at: http://dnr.wi.gov/topic/AirPermits/Options.html on the Registration tab. Copy of the Registration Permits can be found at: http://dnr.wi.gov/topic/AirPermits/Options.html on the Registration tab.
Calculate emissions from individual process lines if necessary. For example: demonstrate RACT exemptions, LACT 10 ton/yr limit, and NR 445	Frequency determined by individual applicable requirement.	Prior to submitting Compliance Certification	Where indicated in the rules	Keep records of data used to make calculations and samples of how calculations were made	DNR's Small Business Environmental Assistance Program links to calculation worksheets and fact sheet are available for a number of regulations: http://dnr.wi.gov/topic/SmallBusiness/Compliance.html

³ Facilities using air pollution control devices shall meet the minimum control efficiencies listed in the Registration Permit. If the control efficiencies are above the minimum required, facilities still need to use the control efficiencies listed in the Registration Permit for the calculation of actual emissions.

Registration Permit Compliance Checklist (AM-519)
Rev. 05/18

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Submit annual Consolidated Reporting for Air Emissions Inventory. NOTE: <i>If emissions are below reporting thresholds you may submit a notification to DNR, in lieu of a full report (follow the instructions on last page).</i>	Annually	March 1 st	Yes	Use DNR's On-line reporting system or Letter to DNR Compliance Contact if below reporting thresholds	Establish a WAMS user ID through DNR's electronic Switchboard http://dnr.wi.gov/topic/switchboard/ Air Emissions Inventory Homepage: http://dnr.wi.gov/topic/airemissions/ Chapter NR 438 contains reporting requirements and thresholds. Links to this air pollution regulation can be found at: http://docs.legis.wisconsin.gov/code/admin_code/nr/400/438.pdf
Pay annual Emission Fees \$400 per year	Annually	June 30 th	No	Enclose stub from your bill with the check	Rules governing emission fees are found in the Wisconsin Statutes, s. 285.69. Links to the Statutes are available at: https://docs.legis.wisconsin.gov/statutes/statutes/285.pdf
Monitoring Summary/Checklist ⁴	Annually	March 1 st For the previous calendar year	No	Use the ROP Monitoring Summary/Checklist (Form 4530-179) or similar documentation	The Monitoring Summary/Checklist can be found here: http://dnr.wi.gov/files/PDF/forms/4500/4530-179.pdf
Submit Annual Compliance Certification Monitoring Report	Annually ⁵	March 1 st – ROP A and B June 30 th – ROP C For previous calendar year	Yes Upload combined report in Switchboard and sign electronically	Use DNR's Comp. Cert and Permit Summary Deviation Form (Forms 4530-178)	Forms and instructions available at: http://dnr.wi.gov/files/PDF/forms/4500/4530-178.pdf and https://dnr.wi.gov/topic/AirPermits/documents/4530-178Instructions.pdf For information on electronic submittal and e-signature: https://dnr.wi.gov/topic/AirPermits/Tutorials.html https://dnr.wi.gov/files/pdf/pubs/am/AM536.pdf

⁴ The Monitoring Summary/Checklist is intended to assist facilities to determine compliance status. Submittal of this report is not required. Facilities should complete the report and keep on site.

⁵ If the facility had permits revoked prior to coverage under the Registration Permit, the facility should submit compliance certification and monitoring reports regarding compliance with the old permit conditions covering the time period that the old permit was in effect. Facilities covered under the ROP A and ROP C must begin submitting the compliance certification and monitoring reports after the first full calendar year of coverage.

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Rev. 05/18

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<i>These tasks will need to be done if circumstances warrant:</i>					
Submit name change in case of change of ownership or legal control	Upon change	Within 30 calendar days of the change	Yes	Yes	Submit information to the ROP Program Coordinator ⁶ .
Facilities that are required to model – Report change that triggered modeling. Submit modeling results	With annual compliance certifications	March 1 st The year after the change was made	Yes	Use Part 1 of the ROP Modeling Assessment Attachment (Form 4530-156A)	Submit modeling results as part of the Annual Compliance Certification Monitoring Report. The Registration Permit Modeling Assessment Attachment is available at: http://dnr.wi.gov/files/PDF/forms/4500/4530-156A.pdf
Portable sources ⁷ only – Submit relocation notices	Upon relocation	At least 20 days prior to relocation.	Yes	Letter or use DNR form 4500-025	Submit information to DNR Central Office. Form: http://dnr.wi.gov/files/PDF/forms/4500/4500-025.pdf

⁶ Alex Torres, Wisconsin Department of Natural Resources, 3911 Fish Hatchery Road, Fitchburg, WI 53711.

⁷ A portable source is one that emits air pollution while standing still but is capable of being moved from place to place such as portable diesel generators, asphalt plants, and stone crushers.

Notification when Not Completing Air Emissions Inventory

Please complete a notification for not completing air emissions inventory if the facility-wide emissions are below the applicable reporting levels in s. NR 438.03 (Table 1), Wis. Adm. Code. This notification should include the following information:

- (1) Facility Name
- (2) Facility Mailing Address
- (3) Facility Physical Address
- (4) Facility Identification Number (FID)
- (5) Name and telephone number of the individual to be contacted regarding the emission inventory
- (6) Reporting Year
- (7) Certification indicating that facility-wide actual emissions are below reporting levels in Table 1 of NR 438.03, Wis. Adm. Code.
- (8) Signature and Date

Please send the notification to the Registration Program Coordinator⁸ in lieu of the air emission inventory and keep a copy of this notification on site.

***DISCLAIMER** – This document is intended solely as guidance and does not contain any mandatory requirements except where requirements found in statute or administrative rule are referenced. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. Any regulatory decisions made by the Department of Natural Resources in any matter addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.*

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