

## Registration Permits Compliance Checklist <sup>1</sup>

Item	Frequency	Due Date	Report Required	Documents Needed	Resources/Comments
<b><i>The following tasks should be done by all facilities soon after receiving coverage under a Registration Permit:</i></b>					
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 from the appropriate ROP tab on <a href="http://dnr.wi.gov/topic/AirPermits/Registration.html">http://dnr.wi.gov/topic/AirPermits/Registration.html</a> .
Request access to the DNR's Switchboard, if you do not already have it.	One time	Before December 31 of the year of Registration Permit coverage <sup>2</sup>	No	No	Create a WAMS user ID and request access through DNR's electronic Switchboard: <a href="http://dnr.wi.gov/topic/switchboard/">http://dnr.wi.gov/topic/switchboard/</a>  The WAMS ID is required for the submittal of compliance documents, including the Air Emissions Inventory, compliance certification, stack test results, and others. Review instructions on how to submit electronic documents: <a href="https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html">https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html</a> .
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. If not, review the Annual Monitoring Summary and Checklist ( <a href="#">Form 4530-179</a> ) under Section A.2 for suggestions on rules that might apply depending on your operations and activities.  DNR's Small Business Environmental Assistance Program can help small businesses. <a href="http://dnr.wi.gov/topic/smallbusiness/">http://dnr.wi.gov/topic/smallbusiness/</a>  Links to current air pollution regulations can be found at: <a href="http://dnr.wi.gov/topic/AirQuality/Rules.html">http://dnr.wi.gov/topic/AirQuality/Rules.html</a>

<sup>1</sup> Additional requirements not listed on this compliance checklist may apply to facilities covered under the Type G Registrations Permits.

<sup>2</sup> 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.

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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"> <li>• Stack parameters</li> <li>• Calculation methods</li> <li>• Material throughputs</li> <li>• Control device monitoring results</li> <li>• Calibration of control device monitoring instruments</li> </ul>	<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. <a href="http://dnr.wi.gov/topic/smallbusiness/">http://dnr.wi.gov/topic/smallbusiness/</a></p> <p>Chapter NR 439 contains many compliance requirements. Links to this air pollution regulation can be found at: <a href="http://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf">http://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf</a></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  Compliance Notification<sup>3</sup>  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, download the rule. Relevant information is usually in the last 3 or 4 pages of the rule. Search for "Am I subject to this Subpart?" <a href="https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-9">https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-9</a></p> <p>Additional information on submitting the initial and compliance notifications can be found under "When must sources comply with a NESHAP?": <a href="http://dnr.wi.gov/topic/AirQuality/HAPFAQ.html">http://dnr.wi.gov/topic/AirQuality/HAPFAQ.html</a></p>

<sup>3</sup> Initial Notification and Compliance Notifications shall be sent to the US EPA through their Electronic Reporting Tool (ERT) and some may also need to be submitted to the DNR – check <http://dnr.wi.gov/topic/AirQuality/HAPFAQ.html> for more information on where to submit a notification.

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Make a list of the control device parameter ranges for each control device.  (Facilities without control devices do not need to do this.)	One time, at a minimum.  Update as equipment is added or changed.	As soon after coverage under the Registration Permit as possible	No	Keep the list of parameter ranges on site	Control device parameters that must be monitored and recorded are in Condition E.8 Table 2 of the Type A, B and G Registration Permits, or Condition E.13 of the Type C Registration Permit.  Section NR 439.055 contains specific requirements for control device monitoring. Links to this rule can be found at: <a href="http://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf">http://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf</a>
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: <a href="http://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf">http://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf</a>
<b>The following tasks need to be done each year so you can submit compliance certifications and annual inventory reports:</b>					
Perform compliance audit to determine compliance status with each applicable requirement <sup>4</sup>	At least annually	Prior to submitting Compliance Certification	No	Keep documents used to determine compliance	Use your facility's compliance demonstration and recordkeeping plan. It may help to go through the Monitoring Summary and Checklist ( <a href="#">Form 4530-179</a> ) as a guide for elements to evaluate for compliance status.  DNR's Small Business Environmental Assistance Program can help small businesses <a href="http://dnr.wi.gov/topic/smallbusiness/">http://dnr.wi.gov/topic/smallbusiness/</a>
Calculate actual emissions <sup>5</sup> of PM <sub>10</sub> , sulfur dioxide, nitrogen oxides, carbon monoxide, VOC, hazardous air pollutants, and lead.	Annually for ROP A and ROP C;  Monthly for ROP B and ROP G	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 on the appropriate ROP tab at: <a href="http://dnr.wi.gov/topic/AirPermits/Registration.html">http://dnr.wi.gov/topic/AirPermits/Registration.html</a> .

<sup>4</sup> Additional environmental audits are required for facilities covered under the Type G Registration Permits. Please contact the Green Tier Program for more details.

<sup>5</sup> 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.

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<p>Calculate emissions from individual process lines if necessary.</p> <p>For example: demonstrate RACT exemptions, LACT 10 ton/yr limit, and NR 445</p>	<p>Frequency determined by individual applicable requirement.</p>	<p>Prior to submitting Compliance Certification</p>	<p>Where indicated in the rules</p>	<p>Keep records of data used to make calculations and samples of how calculations were made</p>	<p>DNR's Small Business Environmental Assistance Program links to calculation worksheets and fact sheet are available for a number of regulations:  <a href="http://dnr.wi.gov/topic/SmallBusiness/Compliance.html">http://dnr.wi.gov/topic/SmallBusiness/Compliance.html</a></p>
<p>Submit annual Consolidated Reporting for Air Emissions Inventory.</p>	<p>Annually</p>	<p>March 1<sup>st</sup></p>	<p>Yes</p> <p>If emissions are below reporting thresholds, submit Under Threshold Notification (UTN).</p>	<p>Use DNR's On-line reporting system for completing either the air emission inventory report or the UTN</p>	<p>Establish a WAMS user ID and request access through DNR's electronic Switchboard <a href="http://dnr.wi.gov/topic/switchboard/">http://dnr.wi.gov/topic/switchboard/</a></p> <p>Air Emissions Inventory Homepage:  <a href="http://dnr.wi.gov/topic/airemissions/">http://dnr.wi.gov/topic/airemissions/</a></p> <p>Chapter NR 438 contains reporting requirements and thresholds. Links to this air pollution regulation can be found at:  <a href="http://docs.legis.wisconsin.gov/code/admin_code/nr/400/438.pdf">http://docs.legis.wisconsin.gov/code/admin_code/nr/400/438.pdf</a></p>

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Submit Annual Compliance Certification	Annually <sup>6</sup>	March 1 <sup>st</sup> – for previous calendar year	Yes  Upload combined report in Switchboard and sign electronically <sup>7</sup>	Use DNR's Comp. Cert and Permit Summary Deviation Form (Forms 4530-178) or similar, and upload using the DNR's Switchboard	Forms and instructions available at: <a href="http://dnr.wi.gov/files/PDF/forms/4500/4530-178.pdf">http://dnr.wi.gov/files/PDF/forms/4500/4530-178.pdf</a> and <a href="https://dnr.wi.gov/topic/AirPermits/documents/4530-178Instructions.pdf">https://dnr.wi.gov/topic/AirPermits/documents/4530-178Instructions.pdf</a>  For information on electronic submittal and e-signature: <a href="https://dnr.wi.gov/topic/AirPermits/Tutorials.html">https://dnr.wi.gov/topic/AirPermits/Tutorials.html</a> <a href="https://dnr.wi.gov/files/pdf/pubs/am/AM536.pdf">https://dnr.wi.gov/files/pdf/pubs/am/AM536.pdf</a>  For additional information about Air Compliance Submittal Actions and uploading documents electronically: <a href="https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html">https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html</a>
Submit Summary of Monitoring <sup>8</sup>	Annually	March 1 <sup>st</sup> – for previous calendar year	Yes  Upload combined report in Switchboard	Combine the Annual Compliance Certification and the Summary of Monitoring, and upload as single document using the DNR's Switchboard	The ROP Monitoring Summary/Checklist (Form 4530-179) can be submitted to satisfy this requirement. The document can be found here: <a href="http://dnr.wi.gov/files/PDF/forms/4500/4530-179.pdf">http://dnr.wi.gov/files/PDF/forms/4500/4530-179.pdf</a>  For additional information about Air Compliance Submittal Actions and uploading documents electronically: <a href="https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html">https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html</a>
Pay annual Emission Fees \$400 per year	Annually	June 30 <sup>th</sup>	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: <a href="https://docs.legis.wisconsin.gov/statutes/statutes/285.pdf">https://docs.legis.wisconsin.gov/statutes/statutes/285.pdf</a>

<sup>6</sup> 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.

<sup>7</sup> The compliance certification report can be uploaded in Switchboard by any authorized personnel, however, only the Responsible Corporate Official in record can certify the accuracy of the report using the e-signature.

<sup>8</sup> Facilities that submit Form 4530-178 are exempt from the submittal of a separate annual summary of monitoring.

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<b><i>These tasks will need to be done if circumstances warrant:</i></b>					
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 based on the instructions at <a href="https://dnr.wi.gov/topic/AirPermits/Changes.html">https://dnr.wi.gov/topic/AirPermits/Changes.html</a> .
Update the name and contact information of corporate officials	Upon change	Immediately	Yes	Send updated information to the Registration Permits Coordinator or update using the DNR Switchboard	Submit information to the ROP Program Coordinator at <a href="mailto:DNRamROPSairpermit@wisconsin.gov">DNRamROPSairpermit@wisconsin.gov</a> . Required contact information includes: name, title, phone number, mail address, and e-mail address. Submit information based on the instructions at <a href="https://dnr.wi.gov/topic/AirPermits/Changes.html">https://dnr.wi.gov/topic/AirPermits/Changes.html</a> .
Facilities that are required to model – Report change that triggered modeling. Submit modeling results	With annual compliance certifications	March 1 <sup>st</sup> 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: <a href="http://dnr.wi.gov/files/PDF/forms/4500/4530-156A.pdf">http://dnr.wi.gov/files/PDF/forms/4500/4530-156A.pdf</a>
Portable sources <sup>9</sup> only – Submit relocation notices	Upon relocation	At least 20 days prior to relocation.	Yes	Letter or use DNR form 4500-025 and submit using DNR Switchboard.	Submit information through Switchboard. Form: <a href="http://dnr.wi.gov/files/PDF/forms/4500/4500-025.pdf">http://dnr.wi.gov/files/PDF/forms/4500/4500-025.pdf</a> For additional information about Air Compliance Submittal Actions and uploading documents electronically: <a href="https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html">https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html</a>

<sup>9</sup> 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.

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Wisconsin Department of Natural Resources  
Air Program – AM/7  
Box 7921  
Madison, WI 53707-7921  
PHONE 608-266-7718 • FAX 608-267-0560  
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