

Air Program Fact Sheet Type B Registration Permit

April 2019

What is a Registration Permit?

The Registration Operation Permit (ROP) is a standardized air pollution control operation permit which authorizes facilities with low actual emissions to operate. Issued along with the ROP is a companion Registration Construction Permit (RCP). The RCP is nearly identical to the ROP. The RCP ensures a smooth and legal transition from the department's traditional permit program to the Registration Permit Program. To keep this fact sheet as simple as possible, the rest of this document refers to Registration Permits as ROP. A ROP 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 ROP.

Previously, DNR issued two ROPs: the Type A ROP for facilities with air pollution emissions less than 25% of the major source threshold for both criteria pollutants and hazardous air pollutants (HAPs), and the Type C ROP for printing facilities with emissions less than 25% of the major source threshold for criteria pollutants and less than 50% of the major source threshold for hazardous air pollutants. In February 2016, the Department issued a Type B ROP. This permit is available for facilities with air pollution emissions up to 50% of the major source thresholds of both criteria and hazardous air pollutants.

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 ROP 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.

What is a Type B Registration Permit (ROP)?

A Type B ROP is for stationary sources with emissions that do not and will not exceed 50% of the major source threshold, except for lead emissions.

Pollutant	Eligibility Threshold
Particulate matter (PM) less than 10 microns (PM ₁₀)	50 tons per year
Sulfur dioxide (SO ₂)	50 tons per year
Carbon monoxide (CO)	50 tons per year
Nitrogen oxides (NO _x)	50 tons per year
Volatile organic compounds (VOCs)	50 tons per year
Lead	0.5 tons per year
Any single federally regulated HAP	5 tons per year
Total of all federally regulated HAPs combined	12.5 tons per year

NOTE: For a list of federally regulated HAPs: <http://www.epa.gov/ttn/atw/orig189.html>

What are the differences between the Type A and Type B ROPs?

The primary difference between the Type A and Type B ROP is the facility-wide emissions limits. The Type B ROP also has some other notable differences, including:

- **Emission limits and associated recordkeeping**
 - Facility-wide emission limits are expressed in terms of rolling consecutive 12-month totals instead of calendar year totals.
 - Emissions must be calculated and recorded monthly instead of annually.
- **Air quality analysis requirements**
 - Contains requirements to perform an air quality analysis, such as a dispersion modeling analysis, for PM₁₀ instead of total suspended particulates (TSP).
 - Requires an air quality analysis of sulfur dioxide (SO₂) and nitrogen dioxide (NO₂) for facilities with maximum controlled emissions greater than 25 tons per year of either pollutant.
- **Other changes**
 - Prescribes the methods that must be used when calculating facility-wide emissions.
 - Baghouse leak detection systems have been added to the list of acceptable monitoring techniques for baghouses and cartridge collectors.
 - Flow coating has been added to list of allowable coating application techniques under the coating process line Latest Available Control Techniques (LACT).

Can a facility convert coverage from one type of ROP to another?

Yes. As long as the facility meets all of the eligibility requirements of the Type B ROP, a facility already covered under a Type A or C ROP may submit an application for coverage under the Type B ROP. The Department will review the application and follow procedures to withdraw the existing Registration Permit coverage before making a new coverage determination under the Type B ROP.

FOR MORE INFORMATION

- For more information on registration permits, go to <http://dnr.wi.gov/topic/AirPermits/Options.html> and click on the Registration tab.
- To view the final Type B ROP, see: <http://dnr.wi.gov/topic/AirPermits/documents/ROPB01RCPB01FinalPermit.pdf>
- Contact the Registration Permit Coordinator at DNRamROPSairpermit@wisconsin.gov.

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