WISCONSIN DEPARTMENT OF NATURAL RESOURCES

Compliance Monitoring Reports Electronic Submittal Guidebook

Air Pollution Control Operation Permits

Air Program

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For more information on the electronic submittal process, contact the facility-assigned compliance inspector.

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Background / Set-Up Options

Compliance Monitoring Report

The Compliance Monitoring Report is required by Part II section D.3 of a facility's Operation Permit and in s. NR 439.03(1)(b) of the Wisconsin Administrative Code. The report is required to include the ***results of monitoring*** required by the permit or, if approved by the Wisconsin Department of Natural Resources (DNR), a summary of the monitoring results. Work with the DNR compliance engineer assigned to the facility to determine what information should be contained in the Monitoring Report.

Monitoring Results vs. Summary of Monitoring Results

Example Permit Requirement: maintain records of baghouse pressure drop readings

monitoring results	a copy of the actual record of each pressure drop reading required
summary of monitoring results	a declaration of the range of the pressure drop values recorded during the reporting period

* Note: the code requires facilities to identify **all** deviations and violations of applicable requirements in the report, regardless of the method of reporting approved for use.

The U.S. Environmental Protection Agency (EPA) no longer requires a separate submittal for sources operating under a Title V permit (see below).

U.S. EPA published a notification of a change to the Compliance Certification Requirements for Title V sources. Effective 9/15/2014, with the exception of major facilities on tribal land, EPA made a determination that the reporting provisions in 40 CFR 70.6(c)(5)(iv) are met by sending the compliance certifications to the state; a separate submittal to EPA Region 5 is no longer required.

Confidential Submissions

If any part of the facility's Compliance Monitoring Report has been approved as confidential information via the confidentiality request approval process, *DO NOT SUBMIT THE CONFIDENTIAL VERSION OF THE DOCUMENT VIA THE*

ELECTONIC UPLOAD SYSTEM. Submit the confidential copy via hard copy in the mail, and submit the public version via the electronic system.

Facility Reporting Guidance

Permittees may submit the report electronically through the Compliance Certification Submittal system. This is the DNR **preferred** method for submittal, though paper copies are still accepted. Please note all document uploads must be in PDF form and may not exceed 100 megabytes in size.

The Compliance Monitoring Report must be signed by the Responsible Corporate Official. If the electronic system is used for submittal, a hard copy ink signature or an electronic signature page MUST be submitted to DNR. If submitting a hard copy with ink signature, include the FID/Company Name on the signature page for identification.

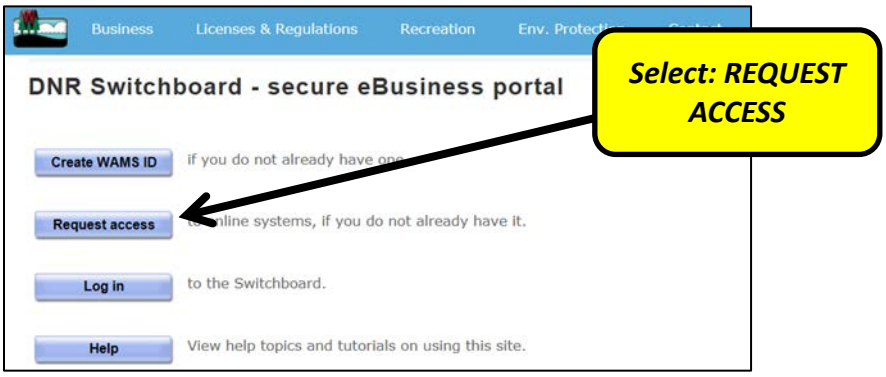
Requesting DNR Switchboard Access to Use Electronic Submittal System

The Switchboard is used to securely login and access forms and reporting systems which are related to a specific company or municipality. The Switchboard can be located by typing “switchboard” into the search button on the DNR home page (dnr.wi.gov), or by navigating to it by hovering over the “Business” button in the blue navigation bar on the DNR home page and clicking “Switchboard” on the dropdown menu.

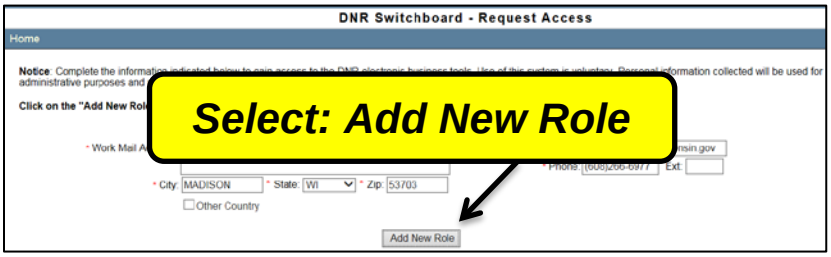
A Web Access Management System (WAMS) user ID is required to log into the Switchboard system. If a WAMS User ID is needed, follow the process to create one by clicking the “Create WAMS ID” button at the top of the Switchboard landing page (http://dnr.wi.gov/topic/Switchboard/). Those with WAMS IDs already assigned can click on the "Log In" button on the Switchboard landing page to begin.

If a WAMs ID is already associated with the company or municipality for other DNR reporting such as Water, Wastewater, or Air Emissions, the company or municipality will ***need to request access for the new Air Compliance Submittal*** role to be able to submit Compliance Monitoring Reports electronically. If the company or municipality already has access to the Air Compliance Submittal role, skip to page 6 of this guide.

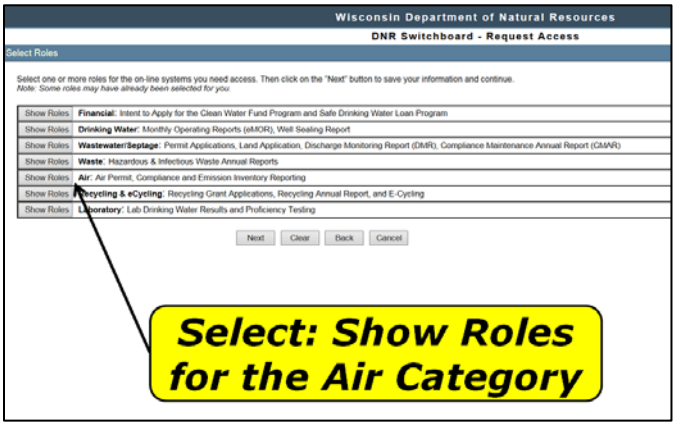
To request access, select the “Request Access” button on the Switchboard landing page.



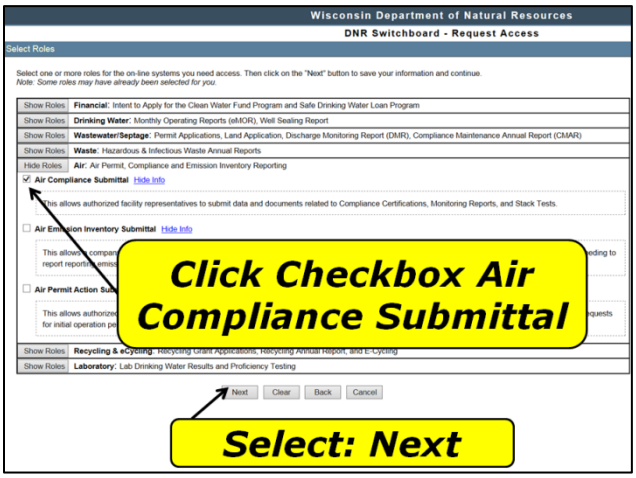
Log in to WAMS and select “Add New Role”.



Next select “Show Roles” for the Air category.



Next, click the checkbox for the Air Compliance Submittal and click “Next”.



If the facility or municipality is new to Switchboard, a hard copy with signature of the Wisconsin Department of Natural Resources Electronic Signature Agreement is required to be on file. Sign and date the Electronic Signature Agreement and mail the original signed version to DNR at:

Switchboard Access Request – SS/7
Department of Natural Resources
PO Box 7921
Madison, WI 53707-7921

The facility or municipality will receive an e-mail notification that access has been granted within two to three business days. Access to a new role for those with existing Switchboard access should be granted within five days. Contact DNR if access is not granted within five days.

Note: If access is requested for Asbestos Notification, the user will need to submit an original, signed, and notarized document.

Electronic Submittal Process

Login Options

Once the facility or municipality completes Switchboard setup, including obtaining a WAMS ID and access to the Air Compliance Submittal option, the permittee can begin electronically submitting Air Compliance documents.

Log in to the Switchboard using one of these three options:

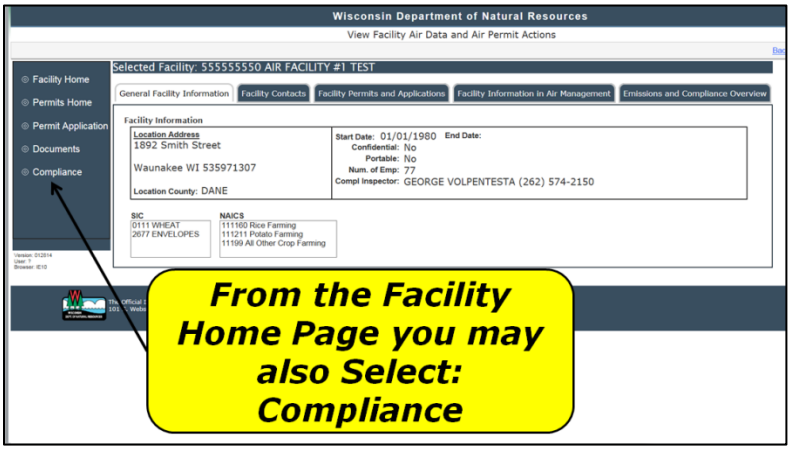
1. Click the “log in” button on the Switchboard landing page (http://dnr.wi.gov/topic/Switchboard/).
2. Select the “Air Compliance Submittal Actions” button on the bottom left of the Switchboard landing page.

3. Click the “log in” button on the Air Compliance Reporting Information landing page (http://dnr.wi.gov/topics/AirPermits/ComplianceReports.html).

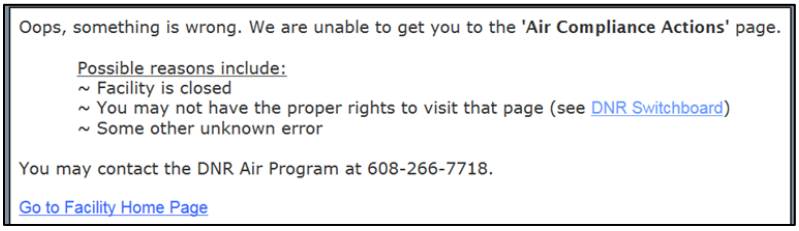
Locate the Facility

The WAMS log in screen will prompt the user to enter his/her User ID and Password. Upon entering this information, the facility or municipality information will populate on the page. Locate the desired facility and select the “Air Compliance Actions” choice in the right-hand column.

Or check the “Compliance” button when on one of the other facility Air pages in WAMS.



* If the following screen appears, the appropriate role was not selected in the “Requesting DNR Switchboard Access” step. Please return to page 4 of this guide for instructions on how to submit the request for access.



* If “no records found” is listed under the facility Monitoring Reports, and the permit requires Compliance Monitoring Reports, contact the compliance inspector assigned to the facility.

Compliance Monitoring Reports Review and Selection

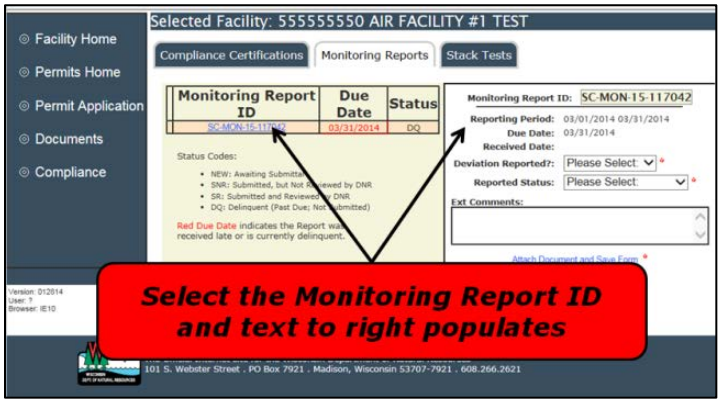
Select the Monitoring Reports tab. Note: the required Monitoring Report submittal ID, due date, and status are shown. If there is inaccurate or missing information, please contact the compliance inspector for the facility.

Monitoring Report Status Codes:

Status Code	Description
NEW	Awaiting Submittal
SNR	Submitted & not reviewed by DNR
SR	Submitted & reviewed by DNR
DQ	Delinquent (past due, not submitted)

A RED Due Date indicates the Report was received late or is currently delinquent.

To begin the submittal process, select the appropriate Monitoring Report ID (located in blue, underlined text) desired. The text at the right of the screen will change, highlighting the Monitoring Report ID information.



- All fields labeled with RED asterisks are required fields.

- Ensure the Reporting Period and Due Date are correct. Contact the facility-assigned compliance inspector if there is an error.

Deviation Reporting

Deviations at any time during the reporting period must be reported. A deviation is defined as any time an owner or operator cannot claim complete conformance with every term and condition of applicable permits and regulation. Use the dropdown menu to select if a deviation will be reported.

If “Yes” is selected, all deviations must be listed in the Monitoring Report. The DNR Form 4530-184, pages 3-4 (Air Operation Permit Compliance Certification & Deviation Summary Report) (http://dnr.wi.gov/topic/airpermits/forms.html) or an equivalent method may be used to report deviations.

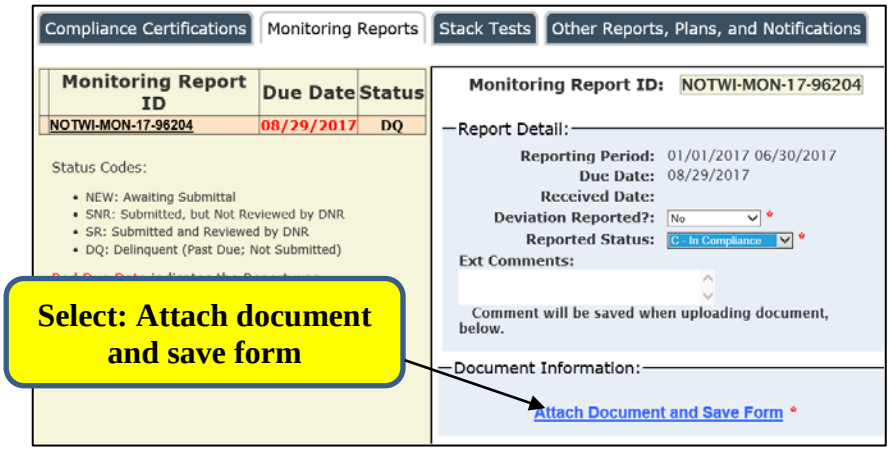
Next select the Facility Compliance Status during the reporting period. Choices are C = Compliance or I = Intermittent.

Facility Compliance Status	Description
Compliance	**Facility was in continuous compliance. This means zero deviations occurred during the reporting period.** (During the entire reporting period identified in this monitoring report, this facility was in **continuous** compliance with **all** conditions specified in the permit identified in this monitoring report. The method used to determine compliance for each condition is the method specified in the permit identified in this monitoring report.)
Intermittent	**Facility was in intermittent compliance**. **This means one or more deviations occurred during the reporting period that were all corrected prior to the end of the reporting period.** (During the entire reporting period identified in this monitoring report, this facility was in continuous compliance with all conditions specified in the permit identified in this monitoring report, EXCEPT for the deviations identified in the deviation summary report. The method used to determine compliance for each condition is the method specified in the permit identified in this monitoring report, unless otherwise indicated and described in the deviation summary report.)

The last box allows the permittee to provide any additional comments to DNR (i.e., “Deviations are listed on page three of attached report.” or “I lost the permit.” or “Report is one year late.”).

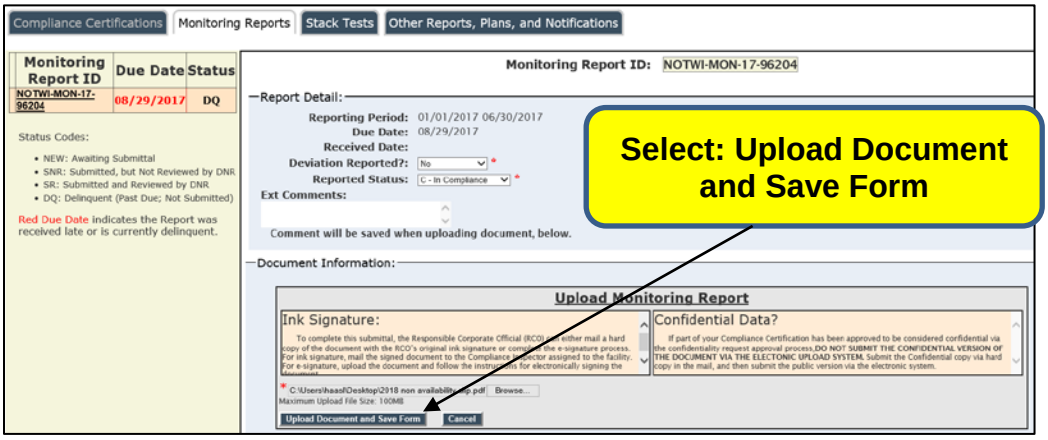
Attaching Documents

Complete the form fields with a red asterisk. Click the “Attach Documents and Save Form” button.



The “Browse” button may be used to locate the monitoring report on the user’s computer or network. Find and select the document for upload and click “Open”. Remember, only PDF files of less than 100 megabytes in size can be uploaded.

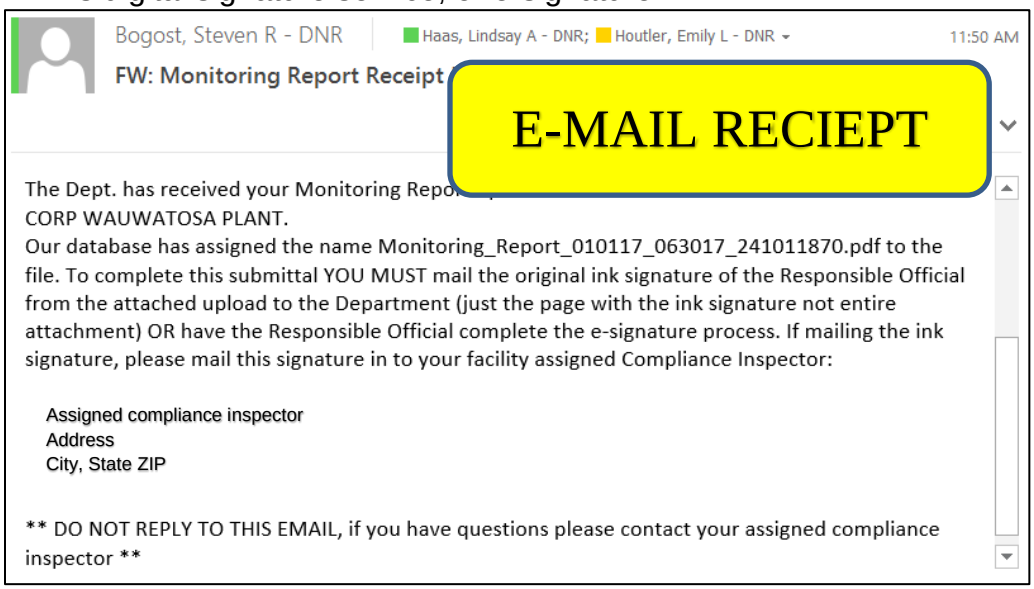
The selected document should be listed in the “Upload Monitoring Report” box next to the “Browse” button. Click “Upload Document and Save Form” to submit the Monitoring Report.



E-mail Receipt

After uploading the Monitoring Report, an e-mail receipt will be sent to the facility.

* NOTE: There will be a reminder in the message to either mail a paper copy of the RCO’s original ink signature on the Monitoring Report to the assigned compliance inspector, or submit and sign the form using the DNR’s digital signature service, or e-signature.



The following e-mail notifications will be sent from DNR to the contact(s) with the "Air Compliance Actions" role. They include:

- E-mail receipt: Monitoring Report submittal
- Courtesy notification: Report period has ended, you can now report
- Courtesy notification: Report ID due in 14 days
- Courtesy notification: Report is past due (if report is not received by the due date)
- Courtesy notification: Report is 20 days past due
- Courtesy notification: Signature not received (30 days after due date)

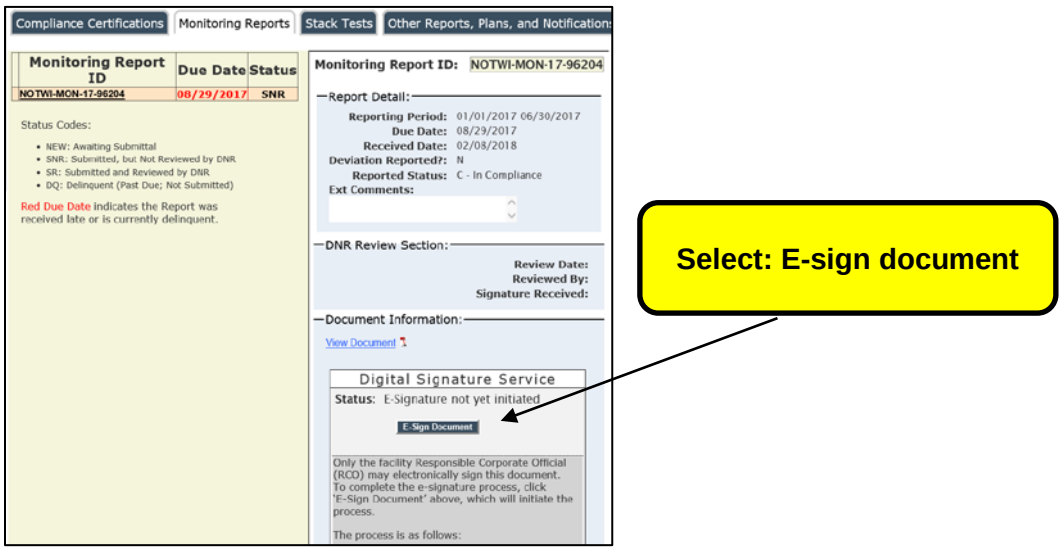
Signature Requirements

To complete the submittal, a signature (either hard copy ink or electronic signature page) must be submitted. For a hard copy ink signature, please mail the signature page to the facility's assigned compliance inspector. For electronic signature, please see the next section.

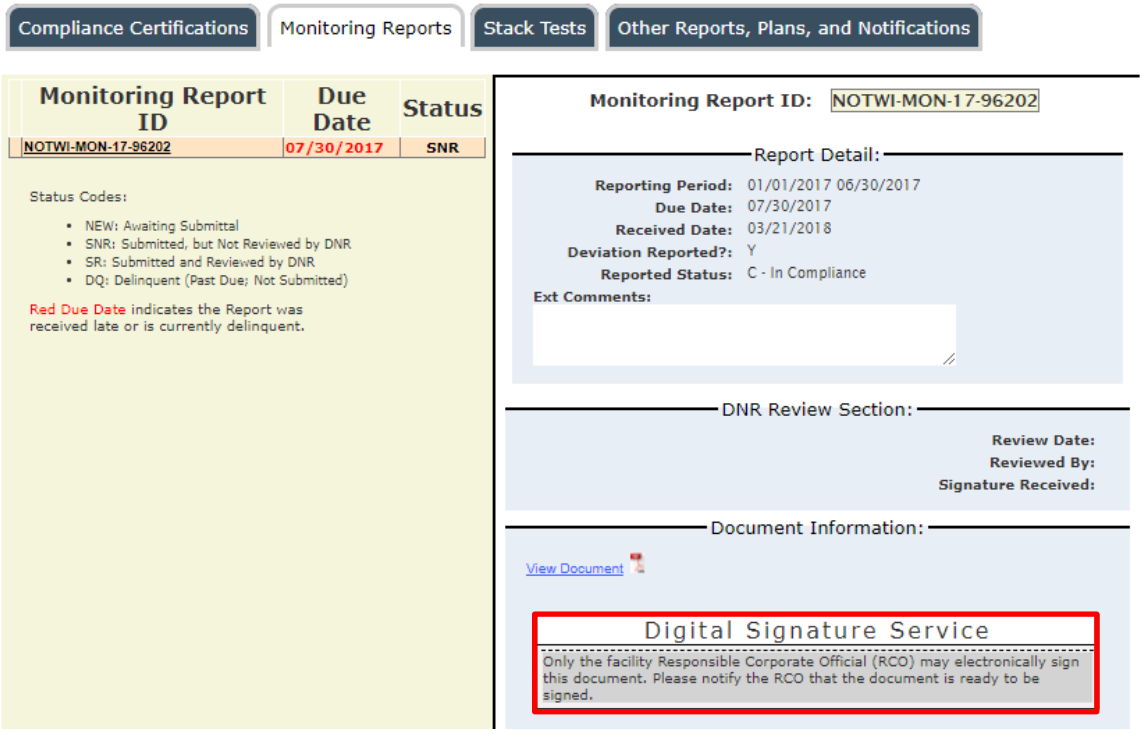
The EPA published a notification of a change to the Compliance Certification Requirements for Title V sources. Effective 09/15/2014, with the exception of major facilities on tribal land, EPA made a determination that the reporting provisions in 40 CFR 70.6(c)(5)(iv) are met by sending the compliance certifications to the state. Therefore, a separate submittal to EPA Region 5 is no longer required.

Electronic Signature (e-Sign)

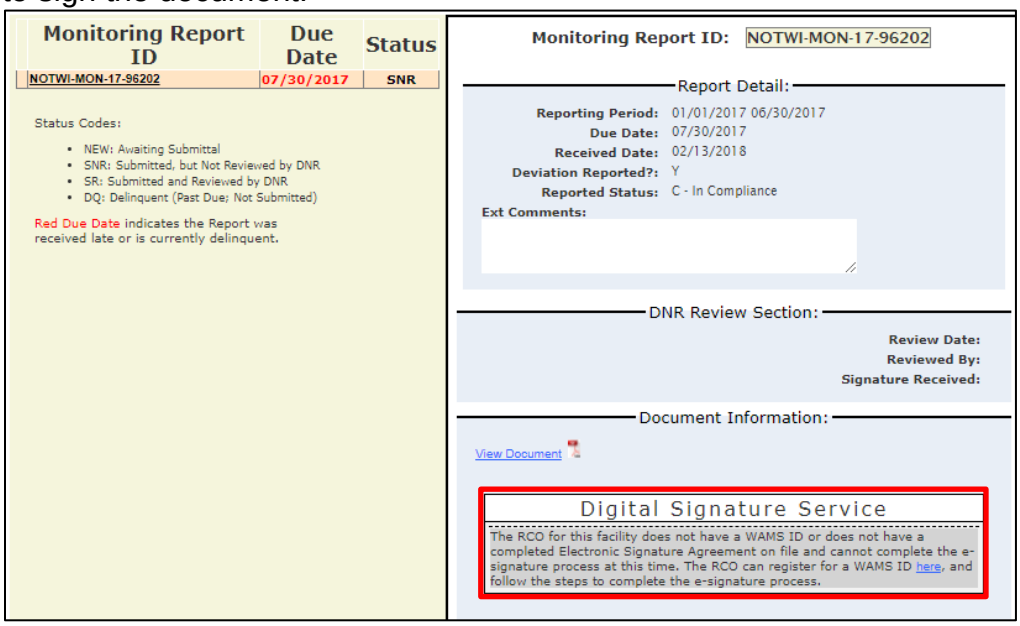
Once a submittal is uploaded, the "e-Sign" option button will appear ONLY if the Responsible Corporate Official is logged in. Only the Responsible Corporate Official can complete the e-signature process using his/her login information.



If the uploader is not the Responsible Corporate Official, he/she will see the message in the red box below and will need to notify the Responsible Corporate Official that the document is ready to be signed.

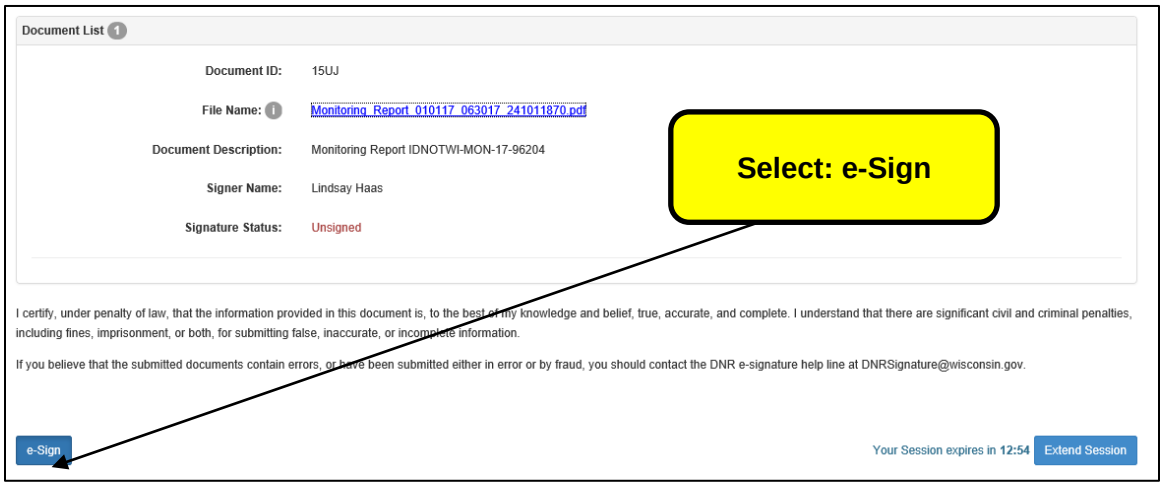


If the uploader is not the Responsible Corporate Official, AND there is no Responsible Corporate Official currently assigned in the system, the user will see the message below in the red box. The Responsible Corporate Official will need to obtain a WAMS ID and complete the login setup process before he/she is able to sign the document.



When the Responsible Corporate Official is logged in, clicking the e-Sign button will generate an email that is sent to the Responsible Corporate Official's email address on file. This email will contain a link to the Digital Signature Service, as well as a temporary PIN code for the service. Click the link and enter the Responsible Official's WAMS ID, password, and temporary PIN from the generated email.

Once the Responsible Corporate Official is logged in, click the "e-Sign" button to sign the document and complete the electronic signature process.

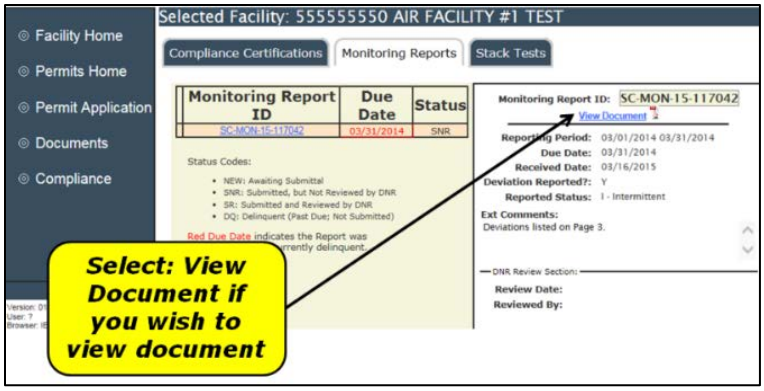


After clicking the button, the signature status changes to "signed" and an email receipt will be sent to the Responsible Corporate Official's email on file. This email is the signature confirmation for this document; retain this confirmation for the facility's records. Contact the facility-assigned compliance inspector with any questions.

Review

Review Submissions

All past and present electronic submissions can be viewed by clicking the "Monitoring Report ID" and selecting "View Document."



After submission, DNR will rename the document, in this format:
Monitoring_Report_Reporting Period_FID

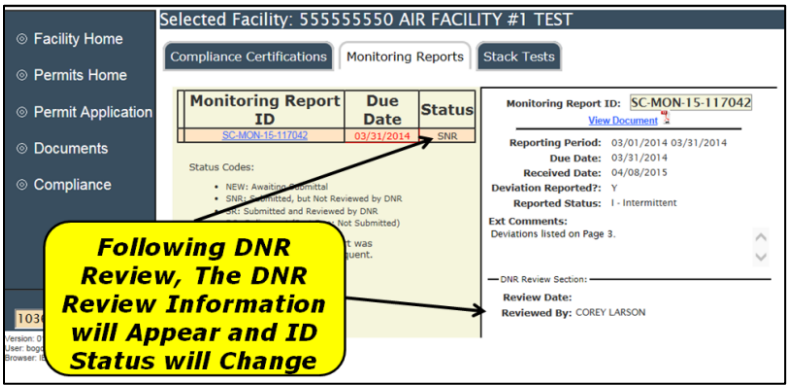
Example*:*
Monitoring Report_010114_123114_555555550
(010114_123114 is equivalent to Jan 1, 2014 to Dec 31, 2014 Reporting Period)

If a re-submit occurs for any reason, DNR will add "_NA" to end of the un-submitted report.

Completed Submissions

The Compliance Monitoring Report submission is complete when ALL STEPS (including the signature process) are complete.

The facility or municipality can follow the DNR review process by locating the DNR Review Section under the Monitoring Reports ID. Listed in this section are the review date and DNR staff reviewing the Monitoring Report. Once DNR has completed its review, the status will be updated.



More Information

Resources

Please visit the Air Compliance Submittal Actions Electronic Reporting webpage at http://dnr.wi.gov/topic/AirPermits/ComplianceReports.html or contact the facility-assigned compliance inspector.

This document is intended solely as guidance and does not include 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 manner addressed by this guidance will be made by applying the governing statutes and administrative rules to the relevant facts.

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