WISCONSIN DEPARTMENT OF NATURAL RESOURCES
NOTICE OF FINAL GUIDANCE & CERTIFICATION

Pursuant to ch. 227, Wis. Stats., the Wisconsin Department of Natural Resources has finalized and hereby certifies the following guidance document.

DOCUMENT ID

AM-19-0011

DOCUMENT TITLE

Compliance Certification Electronic Submittal Guidebook

PROGRAM/BUREAU

Air Management

STATUTORY AUTHORITY OR LEGAL CITATION

Section 285.17, Wisconsin Statutes; Section NR 439.03, Wisconsin Administrative Code

DATE SENT TO LEGISLATIVE REFERENCE BUREAU (FOR PUBLIC COMMENTS)

September 9, 2019

DATE FINALIZED

October 14, 2019

No Comments were received during the comment period 09SEP2019 to 30SEP2019

DNR CERTIFICATION

I have reviewed this guidance document or proposed guidance document and I certify that it complies with sections 227.10 and 227.11 of the Wisconsin Statutes. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is not explicitly required or explicitly permitted by a statute or a rule that has been lawfully promulgated. I further certify that the guidance document or proposed guidance document contains no standard, requirement, or threshold that is more restrictive than a standard, requirement, or threshold contained in the Wisconsin Statutes.

Gail E. Good

October 9, 2019

Signature

Date

WISCONSIN DEPARTMENT OF NATURAL RESOURCES

Compliance Monitoring Reports Electronic Submittal Guidebook

Air Pollution Control Operation Permits

Air Management Program

Publication Number: AM-537-2016

For more information on the electronic submittal process, contact your compliance inspector.

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Background / Set-Up Options

Monitoring Reports

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.

Facility Reporting Guidance

All facilities with an air pollution operation permit must submit a Compliance Monitoring Report to the Department of Natural Resources (DNR). The Environmental Protection Agency (EPA) no longer requires a separate submittal for sources operating under a Title V permit (see sidebar).

Permitees may submit the report electronically through the Compliance Monitoring Report 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 format and may not exceed 100 megabytes in size.

The Compliance Monitoring Report must be signed by the Responsible Official. If the

USEPA recently 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.

electronic system is used for submittal, a HARD COPY INK SIGNATURE page MUST be submitted to DNR (not the entire report document, just the page with ink signature). Be sure to include the FID/Company Name on the signature page for identification.

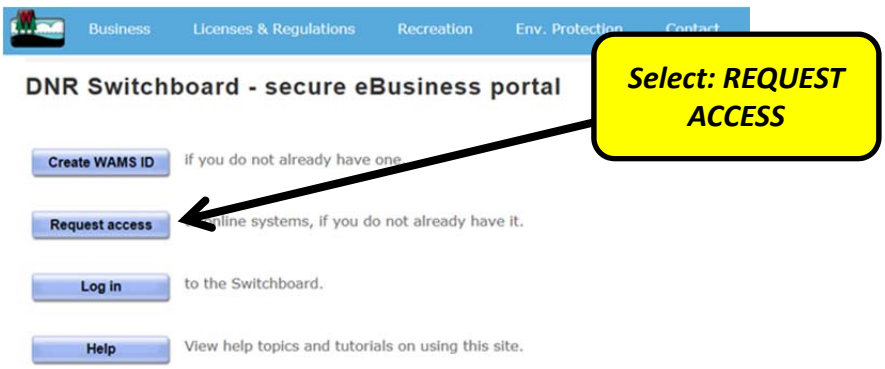
Requesting DNR Switchboard Access to Use Electronic Submittal System

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 drop down menu.

A Web Access Management System (WAMS) user ID is required to log into the Switchboard system. If a WAMS User ID is needed, please 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 ID’s already assigned can click on the "Log In" button on the Switchboard landing page to begin.

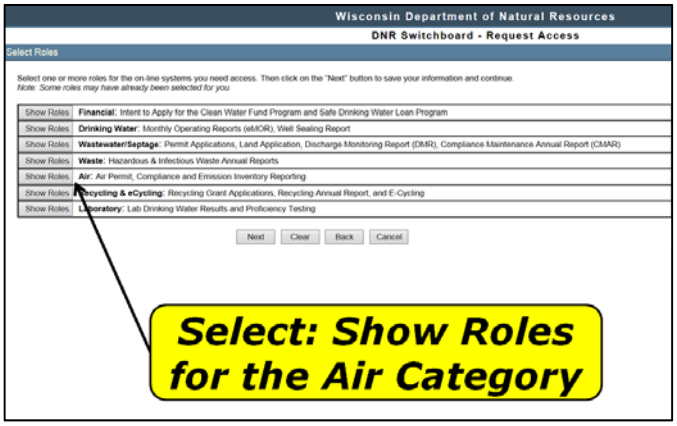
If a WAMs ID is already associated with the company or municipality for other DNR reporting such as Water, Wastewater, or Air Emissions, the company or municipality will ***need to request access for the new Air Compliance Submittal*** role to be able to submit Compliance Monitoring Reports electronically. If the company or municipality already has access to the Air Compliance Submittal role, skip to Page 5 of this guide.

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

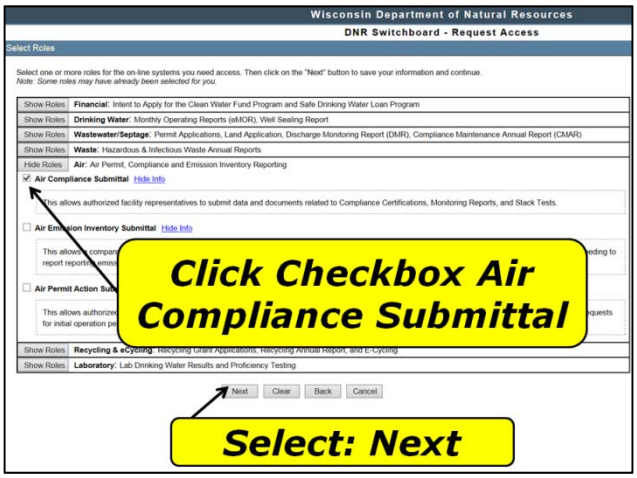


Log in to WAMS and select “Add New Role”:

Next select “Show Roles” for the Air category:



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



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

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

The facility or municipality will receive 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 5 days. Contact the DNR if access is not granted within 5 days.

Please note: If you request access to Asbestos Notification you will need to submit an original, signed and notarized document.

Electronic Submittal Process

Login Options

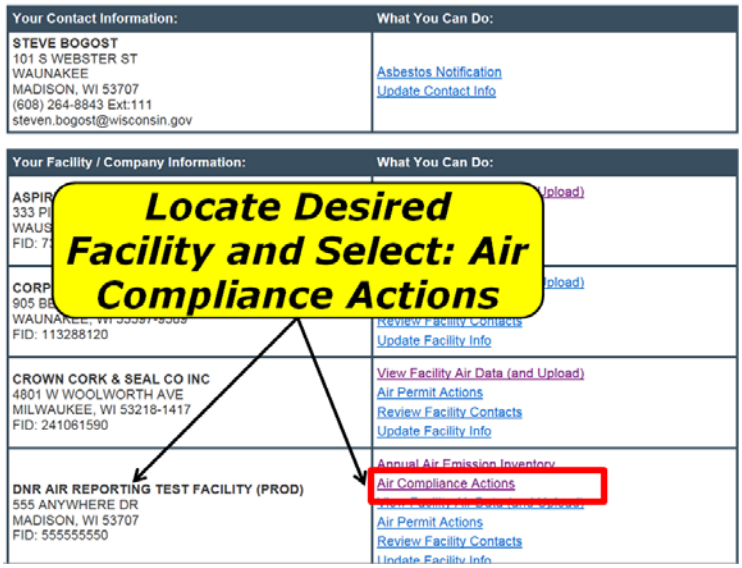
Once the facility or municipality completes Switchboard set-up, including a WAMS ID and access granted to the Air Compliance Submittal option, the permittee can begin electronically submitting Air Compliance documents.

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

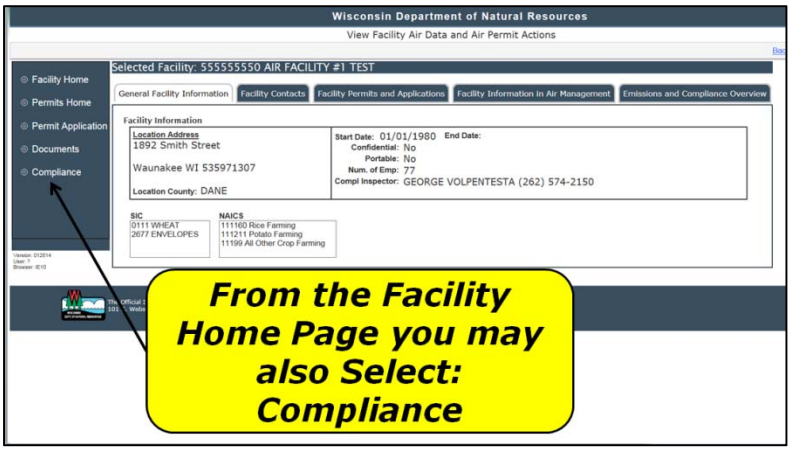
1. Click the "log in" button on the Switchboard landing page (http://dnr.wi.gov/topic/Switchboard/),
2. Selecting the "Air Compliance Submittal Actions" button on the bottom left of the Switchboard landing page.
3. Click the "log in" button on the Air Compliance Reporting Information landing page (*http://dnr.wi.gov/topics/AirPermits/ComplianceReports.html*)

Locate the Facility

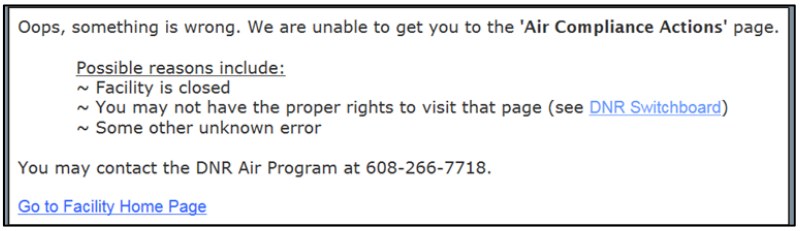
The WAMS log in screen will prompt you to enter your User ID and Password. Upon entering this information, the facility or municipality information will populate the page. Locate the desired facility and select the "Air Compliance Actions" choice in the right-hand column.



Or you can 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 3 of this guide for instructions on how to submit the request.



* 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

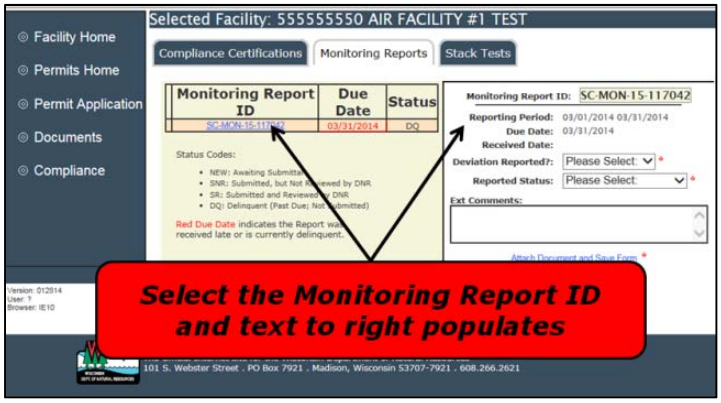
Select the Monitoring Reports tab. Note: The required Monitoring Report submittal ID, due date and status are shown. If there is inaccurate or missing information, please contact your air compliance inspector.

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 a RED asterisks are required fields.
- Ensure the Reporting Period and Due Date is correct. Contact the air 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. DNR Form 4530-184 (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.

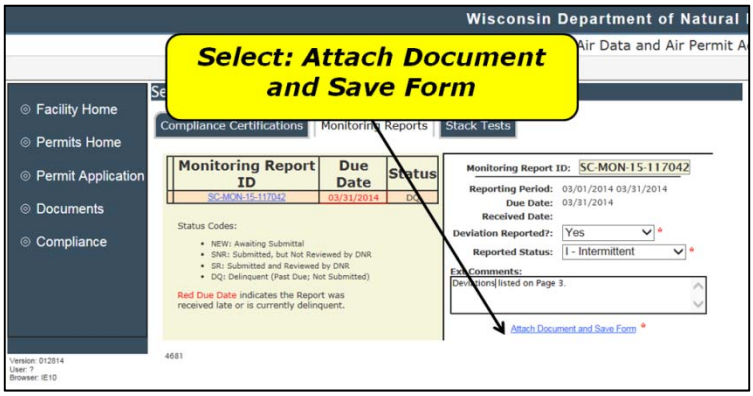
Next select the Facility Compliance Status during the reporting period. Choices are C = Compliance or I = Intermittent.

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 summary 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 the Department (i.e., “Deviations are listed on page 3 of attached report.” or “I lost the permit.” or “Report is one year late.”)

Signature Requirements

Select the “Attach Documents and Save Form” link at the bottom of the page.



An “Upload Monitoring Report” box will appear with an important disclaimer stating “To complete this submittal YOU MUST MAIL THE ORIGINAL INK SIGNATURE OF THE RCP (Responsible Corporate Official) from the uploaded document to the Department (just the page with the ink signature not entire attachment).” Please mail this signature page to the facility’s assigned Air Compliance Inspector.

The DNR is working towards obtaining an EPA approved electronic signature system for this submittal in the future. However at this time a hard copy ink signature is still required to meet federal and state regulations.

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, making 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. After submittal, a return-receipt e-mail containing this same information will be sent to the WAMS ID e-mail on file. Please contact the facility’s assigned compliance inspector with any questions.

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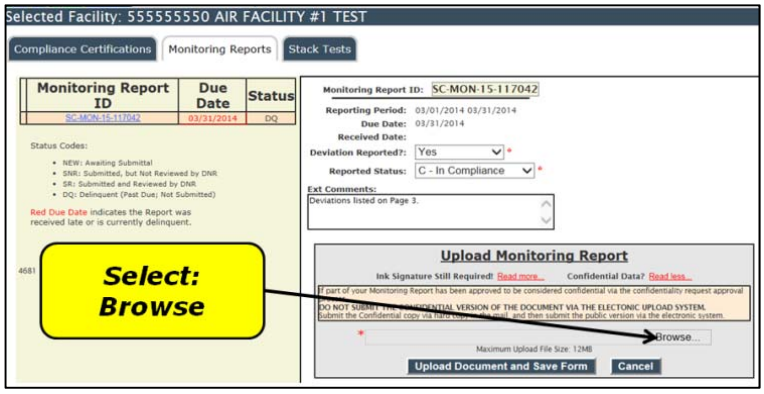
Confidential Submissions

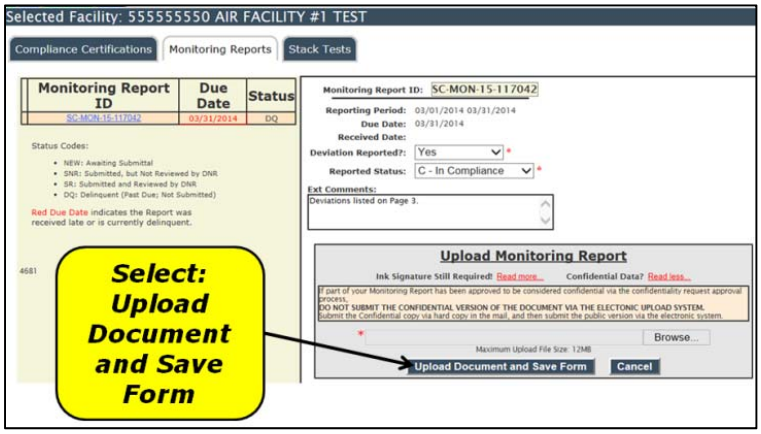
If any part of the facility’s Monitoring Report has been approved to be considered confidential via the confidentiality request approval process, *DO NOT SUBMIT THE CONFIDENTIAL VERSION OF THE DOCUMENT VIA THE ELECTONIC UPLOAD SYSTEM.* Submit the confidential copy via hard copy in the mail, and submit the public version via the electronic system.

Attaching Documents

After reviewing the signature and confidential submission requirements, click the "Browse" button to locate the monitoring report on your computer or network. Find and select the document for upload and press the "Open" button. 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. Select the "Upload Document and Save Form" button 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 mail the original ink signature of the Responsible Official from the monitoring summary report to the assigned compliance inspector.

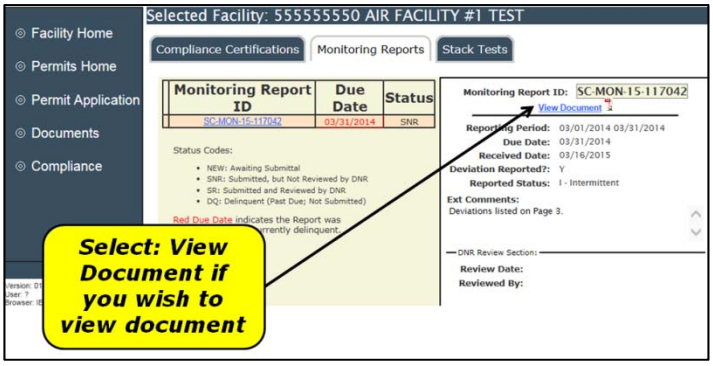
The following e-mail notifications will be sent from the DNR to the contact(s) having the “Air Compliance Actions” role. They include:

- 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)

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

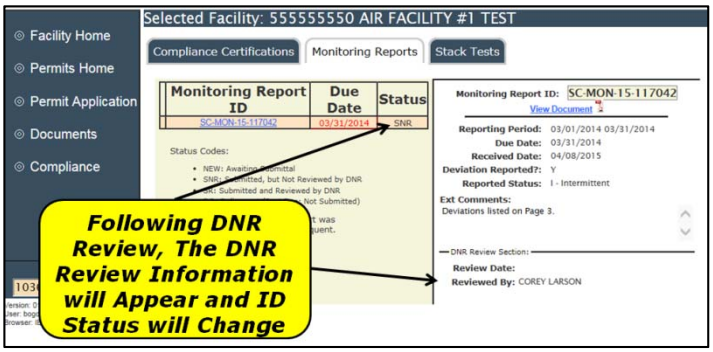
Example*:*
Monitoring Report_010114_123114_555555550
(010114_123114 is equivalent to Jan 1, 2014 to Dec 31, 2014 Reporting Period)

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 mailing the original ink signature page to the air compliance inspector) 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 their review, the status will be updated.



More Information

Resources

Please visit the Air Compliance Submittal Actions Electronic Reporting web page at http://dnr.wi.gov/topic/AirPermits/ComplianceReports.html or contact your compliance inspector.

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. 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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