



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-19-0043

DOCUMENT TITLE

Fact Sheet for Type B Registration Permit

PROGRAM/BUREAU

Air Management

STATUTORY AUTHORITY OR LEGAL CITATION

Section 285.60, Wisconsin Statutes; Chapters NR 406 and NR 407, Wisconsin Administrative Code

DATE SENT TO LEGISLATIVE REFERENCE BUREAU (FOR PUBLIC COMMENTS)

November 4, 2019

DATE FINALIZED

December 2, 2019

No comments were received during the comment period 04NOV2019 to 25NOV2019

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.

November 27, 2019

Signature

Date

Air Program Fact Sheet Type B Registration Permit

February 2016

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 (608) 273-5605 or email at DNRamROPSairpermit@wisconsin.gov.

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. 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.

The Wisconsin Department of Natural Resources provides equal opportunity in employment, programs, services and functions under an Affirmative Action Plan. If you have any questions, please write to Equal Opportunity Office, Department of Interior, Washington, DC 20240. This publication is available in alternative format (large print, Braille, audio tape, etc.) upon request. Please contact the Bureau of Air Management, phone 608-266-7718, for more information.



Wisconsin Department of Natural Resources
Bureau of Air Management
Box 7921- AM/7
Madison, WI 53707
PHONE 608-266-7718 • FAX 608-267-0560
Publication AM-531 2016 v2