

## Compliance Resources Checklist for the Registration Operation Permit or Actual Emissions-Based Operation Permit Exemption

- ❑ Records: Both the Registration Permit and Exemption require that you demonstrate compliance with any of the requirements in NR 400-499 that apply to your facility.

Records demonstrate you are meeting those requirements.

- KEEP ALL RECORDS FOR FIVE YEARS.
- Control Device Parameters: If you have a control device used to reduce air pollution emissions, review chapter NR 439 [[http://docs.legis.wisconsin.gov/code/admin\\_code/nr/400/439](http://docs.legis.wisconsin.gov/code/admin_code/nr/400/439)] for any monitoring and/or testing requirements for that device. They can include things like:
  - Operational Parameters: Measuring parameters that shows if the device is operating correctly, can include: pressure drop for filters, temperature for incinerators. Check with the device manufacturer for recommendations.
  - Minimum Parameters: Look at Table 2 on page 11 of the ROP-A03 for minimum monitoring requirements, here: <http://dnr.wi.gov/topic/AirPermits/documents/ROPA03FinalPermit.pdf>.
  - Maintenance: Keeping logs of any maintenance on the device and corrective actions between regular maintenance.
- Emissions Calculations: Annual records and emissions calculations are needed to show you meet the eligibility criteria of the Registration Permit or Exemption. Keep records of information used to calculate emissions at the end of each calendar year.
  - production or throughput of materials
  - emissions factors or methods used to determine the amount of emission for each unit of material produced/used
  - The SBEAP has a VOC Monthly Emissions calculation example here <http://dnr.wi.gov/topic/SmallBusiness/documents/air/MonthlyVOCemissions.xls>
  - The SBEAP has emissions calculation examples for criteria pollutants and HAPs here <http://dnr.wi.gov/topic/SmallBusiness/documents/air/EmissionsWorksheet.xls>
- Coatings and Organic Compounds: Keep separate emissions calculations for coating process lines and organic compound emitting process lines. Review the Registration Permit for what is required.
- Stack Parameters: Keep records of stack height and other related measurements used to determine if you qualify for Registration Permit.
- Due Diligence: Keep records of your due diligence efforts in checking the air requirements for whether they apply to your facility.
  - Records might include writing down the decision process for each rule that might apply, why it does/doesn't apply, how you can show you meet

it or are exempt. Initials or signature of the person making the decision and a date can be helpful.

- Rules you should review can include:
    - ⇒ particulate matter controls in NR 415,
    - ⇒ volatile organic compound rules in NR 419-425,
    - ⇒ visible emissions in NR 431,
    - ⇒ NSPS in NR 440,
    - ⇒ NESHAPs in NR 440-449, and
    - ⇒ state hazardous air pollutants in NR 445.
  - Review fact sheets on different industries found on the SBEAP web pages:
    - ⇒ <http://dnr.wi.gov/topic/SmallBusiness/Regulations.html> - click on the “Process and pollutant specific regulations” tab
    - ⇒ <http://dnr.wi.gov/topic/SmallBusiness/Resources/> - click on the industries in the box on the right side of the page, or click on “Other Industries” for Biofuels, Chrome electroplating, Construction and Demolition, Fiberglass reinforced plastics, Rock crushing and Sand mining, Secondary Aluminum, Waste water treatment plants, and Wood furniture
  - If your due diligence indicates any of the requirements do apply, then keep any records listed in that chapter/section of the rule.
- ❑ **Reporting:** There are multiple annual reports required under the Registration Permit and the Exemption.
- **Air Emissions Inventory:** Complete the report by March 1<sup>st</sup> each year, unless your emissions are below reporting thresholds in NR 438.
    - Start here <http://dnr.wi.gov/topic/AirEmissions/> to learn how to complete the emissions report.
    - If your emissions are below the reporting levels, submit a letter to DNR to report that your emissions are small enough to not require reporting.
    - If you have made changes during the year, be sure to update the process and device information in the report.
  - **Annual Compliance Certification and Monitoring Summary:** The Registration Permit requires this report be submitted on March 1<sup>st</sup> every year. The first report is due the March following your first full calendar year of coverage.
    - **This report is filed separate from the emissions report, and used to demonstrate you have met the permit conditions throughout the year.**
    - There are forms available to complete this reporting requirement. However, any format may be used to submit the same information to DNR.
    - Instructions for the forms:  
<http://dnr.wi.gov/files/PDF/forms/4500/4530-178Instructions.pdf>
    - ROP Annual Compliance Certification and Monitoring form – 4530-178
      - ⇒ <http://dnr.wi.gov/files/PDF/forms/4500/4530-178.pdf>
      - ⇒ Make sure to describe on this form changes to the facility’s operations that affect air pollution emissions, such as any new emission units or other modifications to emissions units.
    - ROP Deviation Summary Report form - 4530-178A

- ⇒ <http://dnr.wi.gov/files/PDF/forms/4500/4530-178A.pdf>
- ⇒ This form, or a document containing the same information, is used to describe when you did not comply with requirements in the permit.
- ROP Annual Monitoring Summary/Checklist form – 4530-179
  - ⇒ <http://dnr.wi.gov/files/PDF/forms/4500/4530-179.pdf>
  - ⇒ This form does not need to be submitted, but can be used to help determine which rules apply to your facility's operations and compliance status with them.
- Notifications: There are a couple notifications you should provide to DNR during the calendar year; do not wait for the Annual Compliance Certification is submitted to notify the DNR of these issues:
  - If you used air dispersion modeling to qualify for the Registration Permit and you make changes to stack exhaust points, then you need to review the modeling and possibly redo it to make sure you still qualify.
  - If you change owners, notify DNR by letter within 30 days of making the change.