Date: August 27, 2018
From: DNRsmallbusiness@wisconsin.gov
Subject: Reminders for Facilities Covered by a Registration Permit

Dear Registration Permit Holder:

Your business operation is currently covered by a Registration Operation Permit (ROP) issued by the Department of Natural Resources (DNR) Air Program. The DNR's Small Business Environmental Assistance Program (SBEAP) and the Air Program work together on providing services and assistance to small businesses.

Reporting deviations – due <u>next</u> business day

Facilities are required (NR 439.03(4), Wis. Adm. Code) to **report any deviation** from permit requirements, certain malfunctions or other unscheduled events (e.g. accidental release of pollutants) at the source that were not reported in advance.
- DNR created a **form that is available for use** in these situations
  https://dnr.wi.gov/files/PDF/forms/4500/4530-182.pdf
- For examples, look under the Compliance tab on the Forms page
  https://dnr.wi.gov/topic/AirPermits/Forms.html

Federal standards

When a source is affected by a federal New Source Performance Standard (NSPS) or National Emission Standard for Hazardous Air Pollutants (NESHAP) allowed under the ROP, the **facility is responsible** for understanding and demonstrating compliance with the rule.
- To learn if a rule affects the facility:
  - Review **lists of the NESHAP and NSPS** categories on U.S. EPA's website to determine whether a category fits the facility's operations:
    - NESHAP: https://www.epa.gov/stationary-sources-air-pollution/national-emission-standards-hazardous-air-pollutants-neshap-9
    - NSPS: https://www.epa.gov/stationary-sources-air-pollution/new-source-performance-standards
  - **EPA created compliance guides** for many of the NESHAP categories. Each rule has its own set of web pages accessible from the lists above.
  - **Before each new construction project that could make the facility subject to a federal standard, contact DNR to confirm that this standard is allowed under the ROP.**
- If affected by a rule, some tips on demonstrating compliance:
  - Include **examples of how the facility is complying** in the annual monitoring summary report. There are tips in the Application Guides for questions four and five of ROP A and ROP B.
  - Some compliance **certifications** for federal standards must be **sent to U.S. EPA**. Review information at http://dnr.wi.gov/topic/AirQuality/HAPFAQ.html to determine where to send the certifications.

Stack testing

Testing the amount of emissions from exhaust stacks is one method by which DNR determines that a facility is meeting requirements. Some sections of the Wisconsin Administrative Code require periodic testing, which could be annual, biennial or every five years.
- Learn more about what to do when DNR requires a stack test: http://dnr.wi.gov/files/PDF/pubs/sb/sb119.pdf.

Malfunction prevention and abatement plan

Each facility that may emit hazardous air pollutants or **emits more than 15 pounds a day or three pounds an hour** of any air contaminant with an emission limit must prepare a **Malfunction Prevention and Abatement Plan**.

- Learn more about whether a plan may apply and find example plans here: http://dnr.wi.gov/cias/guidance/guidanceexternal/GuidanceItem.aspx?item_seq_no=2349

To receive these and other communications from DNR, it is important to **maintain current contact information** for facility roles within the Air Reporting System. A tutorial on updating ARS Facility Contact is available at: http://dnr.wi.gov/topic/AirEmissions/Tutorials.html.

Any questions about Registration Permits can be directed to the Registration Program Coordinator at DNRAMROPSAIRPERMIT@wisconsin.gov.

Other questions can be directed to the SBEAP at DNRsmallbusiness@wisconsin.gov or 855-889-3021.