State of Wisconsin
Department of Natural Resources
Bureau of Air Management
PO Box 7921, Madison WI 53707-7921
dnr.wi.gov

Instructions for Forms 4530-178: Air Pollution Registration Operation Permit (ROP) Compliance Certification

(R 10/2025)

General Instructions: This resource tool was developed by the Wisconsin Department of Natural Resources (DNR) to assist facilities operating under a Registration Operation Permit (ROP) with annual monitoring summary and compliance certification requirements. This tool is designed to guide facilities through the air rules from Chapters NR 400-499, Wisconsin Administrative Code (Wis. Adm. Code). Completing this document and submitting it to the department, will satisfy the facility's annual ROP certification and annual summary of monitoring obligations. Note: This form does not serve to fulfill Annual Consolidated Reporting (e.g. Air, HW, WW, etc.) or Air Emissions Inventory requirements which is due by March 1 of every year. Go to the Air Emissions Reporting webpage http://dnr.wi.gov/topic/AirEmissions/ for assistance on the annual reporting process.

The Compliance Certification, Form 4530-178, should be reviewed before creating a final version. Using the Monitoring Summary Checklist, Form 4530-179, first is helpful in completing the Compliance Certification. Note that Monitoring Summary Checklist is not required to be completed but provides an explanation of all applicable requirements that the Responsible Official certifies in the Compliance Certification. If completed, the facility may wish to retain a copy of Monitoring Summary Checklist for the facility's records. The Compliance Certification shall be completed and submitted to the department by March 1 of every year. After this Compliance Certification form is completed, upload the PDF form through the DNR Switchboard at https://dnr.wisconsin.gov/topic/Switchboard and then the Responsible Official may use the electronic signature to finalize the submittal process. Alternatively, a copy with an original ink signature of the Responsible Official may be sent to the Wisconsin Department of Natural Resources, Air Program, Attn: ROP Comp Certs, PO Box 7921, AM/7, Madison, WI 53707-7921. Please review the instructions for electronic submittal of the form under Compliance Certification here: https://dnr.wi.gov/topic/AirPermits/ComplianceReports.html. Retain a copy of all materials submitted to the department on-site for at least five years.

Instructions for Compliance Certification, Form 4530-178

Section I. Facility Information

- Permit information can be found in the department letter sent to the facility approving the ROP coverage. If the approval letter cannot be located, it is available on the department's website using the permit tracking search tool Air Permit Search | | Wisconsin DNR.
- The department uses the North American Industry Classification System (NAICS) Code to determine the primary activities of the facility. For more help, consult the following website to
- identify which NAICS title best describes your facility: https://www.census.gov/naics/
- The "Facility Identification Number" (FID) is found near the top right portion of the approval letter.
- The "Registration Operation Permit Number" is found near the top right portion of the approval letter.
- The "Reporting Period" is always the previous calendar year, i.e., from January 1 to December 31 of each year.
- "Responsible official" means one of the following:
  - (a) For a corporation, one of the following:
    - (1) A president, secretary, treasurer or vice-president of the corporation in charge of a principal business function.
    - (2) Any other person who performs similar policy or decision-making functions for the corporation.
    - (3) A duly authorized representative of a person listed in subd. (1) or (2) if the representative is responsible for the overall operation of one or more manufacturing, production or operating facilities applying for or subject to a permit and the representative is approved in advance by the department.
  - (b) For a partnership or sole proprietorship: a general partner or the proprietor, respectively.
  - (c) For a municipality, or a state, federal or other public agency: either a principal executive officer or ranking elected official. For the purposes of this paragraph, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency, for example, a regional administrator of the U.S. Environmental Protection Agency (U.S. EPA).
  - (d) Notwithstanding pars. (a), (b) and (c), for affected sources, the designated representative.
  - (e) The responsible official signing the Compliance Certification is assigned in the DNR Switchboard.
- Compliance Contact Person is the staff or consultant completing the Compliance Certification. Note: this person cannot sign the Compliance Certification.
- Indicate whether the facility has undergone any changes during the previous calendar year. Changes include the removal, replacement, or addition of equipment or using new materials, as well as the addition of used equipment from another location. Examples include increasing the heating capacity of a boiler, adding a new printing press to the existing number of printing presses, changing the solvent used for cleaning operations, or adding a spray paint booth.
- List of all emissions units that were in place at the beginning of the year, and then highlight any new units added during the calendar year covered by this report. This list should match with the emission units included in the Air Emission Inventory (AEI) report. For example:
  - B01 - 10 million BTU/hr. boiler for plant heat
  - P01 - paint booth with overspray filter
  - P02 - parts wash line

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Section II. Compliance Evaluation

The Monitoring Summary and Checklist, Form 4530-179, can be used as a tool to help fill out the appropriate response for each question in section II. For each question in section II there is the option of checking "TRUE," "FALSE" or "N/A." If a rule or requirement does not apply, select "N/A" for "not applicable." Check "TRUE" if the facility met the permit requirement for the entire reporting period. Otherwise, check "FALSE" if the facility did not meet the requirement for the entire reporting period. If "FALSE" is checked, the facility must complete the Deviation Summary Report in Section III of Form 4530-178 and describe the deviation from the specific permit condition or applicable requirement for the reporting period. Each question in Section II is explained below.

A. Compliance with Emission Limitations in Section I.A. - Emission Caps

1. Emissions of Particulate Matter less than 10 microns (PM10) were below the emissions cap stated in the permit.

Emissions of particulate matter with diameter smaller than 10 micrometers (PM10) from the total facility should be compared against the ROP emissions cap (25 TPY - ROPA and ROPC, 50 TPY - ROPB, and less than 80 TPY - ROPG). In the case of ROPA and ROPC, calendar year emissions shall be used to compare against the emissions cap. For ROPB and ROPG, the 12-consecutive month rolling total emissions shall be used to compare against the emissions cap for each month in the reporting period. Only control devices and efficiencies listed in the ROPA, ROPB or ROPC can be used to calculate emissions. Control efficiencies higher than those listed in the ROP can only be used if required by an applicable rule, or if the facility is covered under the ROPB or ROPG and operates a wall/overspray filter guaranteed by the manufacturer to meet a higher control efficiency. Facilities are encouraged to use an emission factor that is specific to PM10 since using an emission factor for total particulate matter might overestimate the emissions. All emission units shall be included in the calculations except those listed in Attachment 1 of ROPA, ROPB and ROPG, or Attachment 3 of ROPC.

2. Emissions of Volatile Organic Compounds (VOC) were below the emissions cap stated in the permit.

Emissions of volatile organic compounds (VOC) or reactive organic gases (ROG) from the total facility should be compared against the ROP emissions cap. If the facility is located in an attainment area for ozone, VOC emission cap is: 25 TPY in ROPA and ROPC, 50 TPY in ROPB, and less than 80 TPY in ROPG. However, the emissions cap is lower if the facility is located in a serious, severe, or extreme non-attainment area for ozone. Contact the Registration Permits Program Coordinator with questions on the current attainment status of the area where the facility is located and the emissions cap that applies. In the case of ROPA and ROPC, calendar year emissions shall be used to compare against the emissions cap. For ROPB and ROPG, the 12-consecutive month rolling total emissions shall be used to compare against the emissions cap for each month in the reporting period. Only control devices and efficiencies listed in the ROPA, ROPB or ROPC can be used to calculate emissions. Control efficiencies higher than those listed in the ROP can only be used if required by an applicable rule; or if the facility is covered under the ROPB, ROPC and ROPG and operates a thermal and catalytic oxidizer with a higher control efficiency determined by a department approved stack test conducted within the last five years. All emission units shall be included in the calculations except those listed in Attachment 1 of ROPA, ROPB and ROPG, or Attachment 3 of ROPC. Fugitive indoor emissions from non-exempt units shall be included in the calculations.

3. Emissions of Nitrogen Oxides (NOx) were below the emissions cap stated in the permit.

Emissions of nitrogen oxides (NOx) which is the combination of nitric oxide (NO) and nitrogen dioxide (NO2) from the total facility should be compared against the ROP emissions cap. If the facility is located in an attainment area for ozone, NOx emissions cap is: 25 TPY in ROPA and ROPC, 50 TPY in ROPB, and less than 80 TPY in ROPG. However, the emissions cap is lower if the facility is located in a serious, severe, or extreme non-attainment area for ozone. Contact the Registration Permits Program Coordinator with questions on the current attainment status of the area where the facility is located and the emissions cap that applies. In the case of ROPA and ROPC, calendar year emissions shall be used to compare against the emissions cap. For ROPB and ROPG, the 12-consecutive month rolling total emissions shall be used to compare against the emissions cap for each month in the reporting period. All emission units shall be included in the calculations except those listed in Attachment 1 of ROPA, ROPB and ROPG, or Attachment 3 of ROPC.

4. Emissions of Sulfur Dioxide (502) were below the emissions cap stated in the permit.

Emissions of sulfur dioxide (SO2) from the total facility should be compared against the ROP emissions cap (25 TPY - ROPA and ROPC, 50 TPY - ROPB, and less than 80 TPY - ROPG). In the case of ROPA and ROPC, calendar year emissions shall be used to compare against the emissions cap. For ROPB and ROPG, the 12-consecutive month rolling total emissions shall be used to compare against the emissions cap. All emission units shall be included in the calculations except those listed in Attachment 1 of ROPA, ROPB and ROPG, or Attachment 3 of ROPC.

5. Emissions of Carbon Monoxide (CO) were below the emissions cap stated in the permit.

Emissions of carbon monoxide (CO) from the total facility should be compared against the ROP emissions cap (25 TPY - ROPA and ROPC, 50 TPY - ROPB, and less than 80 TPY - ROPG). In the case of ROPA and ROPC, calendar year emissions shall be used to compare against the emission cap. For ROPB and ROPG, the 12-consecutive month rolling total emissions shall be used to compare against the emission cap for each month in the reporting period. All emission units shall be included in the calculations except those listed in Attachment 1 of ROPA, ROPB and ROPG, or Attachment 3 of ROPC.

6. Emissions of Lead (Pb) were below the emissions cap stated in the permit.

Emissions of lead (Pb) from the total facility shall be below 0.5 TPY for all types of ROPs. In the case of ROPA and ROPC, calendar year emissions shall be used to compare against the emissions cap. For ROPB and ROPG, the 12-consecutive month rolling total emissions shall be used to compare against the emissions cap for each month in the reporting period. All emission units shall be included in the calculations except those listed in Attachment 1 of ROPA, ROPB and ROPG, or Attachment 3 of ROPC.

7. Emissions of Section 112(b) Hazardous Air Pollutants (HAPs) were below the emissions cap stated in the permit.

Emissions of federally regulated Hazardous Air Pollutants (HAPs) from the total facility should be compared against the ROP emissions caps for a single HAP and for the combination of all HAPs. The emissions caps are: in ROPA - 2.5 TPY for single HAP and 6.25 for a combination of all HAPs, in ROPB - 5 TPY for single HAP and 12.5 for a combination of all HAPs, in ROPC - 5 TPY for single HAP and 12.5 for a combination of all HAPs, and in ROPG - less than 8 TPY for single HAP and less than 20 for a combination of all HAPs. The list of federal HAPs can be found here: Initial List of Hazardous Air Pollutants with Modifications | US EPA. In the case of ROPA and ROPC, calendar year emissions shall be used to compare against the emissions caps. For ROPB and ROPG, the 12-consecutive month rolling total emissions shall be used to compare against the emissions caps for each month in the reporting period. Only control devices and efficiencies listed in the ROPA, ROPB or ROPC can be used to calculate emissions. Control efficiencies higher than those listed in the Registration Permit can only be used if is required by an applicable rule; or if the facility is operating under the ROPB, ROPC and ROPG a higher control efficiency when a department approved stack test has been conducted within the last five years. All emission from the facility shall be included in the calculations except emissions from air emission units listed in Attachment 1 of ROPA, ROPB, and ROPG or Attachment 3 of ROPC.

B. Compliance with Emission Limitations - Organic Compound Limitations

1. Requirements within the VOC rules in **NR 419, NR 420, NR 421 and/or NR 423 Wis. Adm. Code were met.**

Facilities that emit VOC are subject to one or more requirements in chapters NR 419 to NR 423. All facilities are subject to the general limitations in section NR 419.04 that requires the use of good operating practices for handling VOC, and taking precautions to prevent the spillage, escape or emissions of organic compounds, solvents, or mixtures. Additionally, facilities with certain operations or activities that meet the location, emission thresholds, and production activity criteria shall meet the applicable requirements in chapters **NR** 419 to **NR** 423. Once a facility is subject to requirements in these chapters, the facility shall continue meeting the rule regardless of a reduction in emission rates or changes to material usage.

2. Requirements for all VOC emitting units, subject to a RACT under s. NR 422.05 to 422.155, Wis. Adm. Code, or where elected to meet RACT in place of NR 424, Wis. Adm. Code, were met.

Facilities with specified operations or activities, that meet the location, emission levels, and production activity criteria shall meet one or more reasonably available control technology (RACT) requirements in chapters NR 422.05 to NR 422.155. Any facility that does not meet the location or emission thresholds criteria but is in the same industrial group as those for which the section in NR 422 was written can elect to meet the RACT requirements as a method of complying with NR 424. All sources subject to or electing RACT shall meet all compliance requirements included in the RACT such as emission limitations, control efficiency, testing, reporting, etc. Once a source is subject to RACT requirements in this chapter, the source shall continue meeting the rule regardless of a reduction in emission rates or changes to material usage.

3. Requirements for VOC emitting process lines subject to NR 424, Wis. Adm. Code, which can include LACT, were met.

VOC emissions from each process line that is not subject to emission limitations listed elsewhere in chs. NR 419 to 423 need to be controlled as required under s. NR 424.03. These requirements may be met by: (1) adopting a RACT that applies to the same type of production activity (as explained above), (2) controlling VOC by at least 85 percent, or (3) meeting the latest available control technique (LACT) requirements included in the ROP as required under chapter **NR** 424. The LACT included in the ROP consists of limiting VOC emission to less than 10 TPY per process line and, if the facility operates a coating line, the use of high transfer application techniques such as high-volume low pressure (HVLP) spray guns. ROPA and ROPB also include a LACT for Hot-Mix Asphalt Plants. Refer to each Registration Operation Permit for additional details.

C. Compliance with Other Applicable Requirements in NR 400 - NR 499 and Federal Requirements

1. Particulate matter limitations or requirements within NR 415, Wis. Adm. Code., were met.

Facilities that emit particulate matter (PM) are subject to one or more requirements in chapter NR 415. PM emissions from production processes, fuel burning installation, ledge rock quarries, industrial sand mines, crushed stone and sand and gravel plants and fugitive dust are all regulated under this chapter. Note that NR 415 regulates PM which corresponds to the fraction of the particulate matter with diameter smaller than 100 micrometers. Thus, emissions of PM are always equal or higher than PM10. In order to compare against the PM emission limits for processes in s. NR 415.05, the flow rate of gas vented from each stack or the process weight rate in tons per hour shall be known. If the facility operates boilers, non-diesel engines, fire pumps, furnaces, or any other fuel burning unit, the emission limits in s. NR 415.06 shall be met which are a function of the maximum heat input capacity. Gasoline and diesel fired stationary and semi-stationary engines are the exception and are subject to the particulate matter emission limitations in s. NR 485.055. List compliance status under this chapter in 10., below

2. Opacity limitations within NR 431, Wis. Adm. Code, were met.

Facilities that emit particulate matter shall also certify that such emission does not exceed the opacity limitations in chapter NR 431. Only staff certified in U.S. EPA Method 9 - Visual Opacity can measure opacity when a visible plume is observed. The facility may choose to have a continuous opacity monitor installed. Additional information about U.S. EPA Method 9 can be found here: Method 9 - Visual Opacity | US EPA. Diesel fired semi-stationary engines are the exception and are subject to the visible emission limitations in s. NR 485.05. List compliance status under this chapter in 10., below

3. Thresholds of hazardous air pollutants (HAP) listed in Tables A-C in **NR 445 Wis. Adm. Code were achieved without process limitations.**

Facilities that emit state-regulated hazardous air pollutants (HAPs) shall meet the requirements in chapter NR 445. Note that the list of federal HAPs and state HAPs are different. Table A of chapter NR 445 (Wisconsin Legislature: Chapter NR 445) contains the list of state regulated HAPs and their
respective emission thresholds, that are established as a function of stack height. HAP emissions from all stacks within each height range (e.g. 0 to 25 ft) shall be combined to compare against the thresholds (hourly or annual as listed in the table). If the stacks are obstructed or non-vertical, the HAP emissions should be multiplied by 4 before comparing against the emission thresholds in Table A. In the case that the emission thresholds in Columns (c), (d), (e) or (f) of Table A are exceeded, the facility shall conduct an air dispersion modeling analysis and demonstrate the ambient air standard in Column (g) is protected. Facilities with emissions above the table threshold that are then subject to BACT or LAER control requirement listed in Column (i) are ineligible for ROPA, ROPB or ROPC coverage and need to undergo additional permitting to be allowed with the ROPG.

4. Records and/or compliance demonstration materials to demonstrate compliance with all applicable NSPS were kept. List all applicable NSPS here:

Certain facilities might be subject to a New Source Performance Standard (NSPS) included in the Code of Federal Regulations. Facilities can be subject only to those NSPS standards identified in the ROPA and ROPB. If the facility is affected by a NSPS that is not identified in the ROP, then the facility is ineligible for ROP coverage. Facilities subject to any NSPS are responsible for understanding and complying with any initial notification, emission limit, testing, controls, reporting, and/or recordkeeping requirements. The current list of NSPS can be found here: New Source Performance Standards | US EPA. List any applicable NSPS in the Annual Compliance Certification.

5. Records and/or compliance demonstration materials to demonstrate compliance with all applicable NESHAP were kept. List all applicable NESHAP here:

Certain facilities might be subject to a National Emission Standard for Hazardous Air Pollutants (NESHAP) included in the Code of Federal Regulations. Facilities covered by ROPA or B can be subject only to those NESHAP standards identified in that permit. If the NESHAP is not identified in the ROP, then the facility is ineligible for ROP coverage. Facilities subject to any NESHAP are responsible for understanding and complying with any initial notification, emission limits, testing, controls, reporting, and/or recordkeeping requirements. The current list of NESHAPs can be found here: National Emission Standards for Hazardous Air Pollutants (NESHAP) | US EPA. List any applicable NESHAP in the Annual Compliance Certification.

6. Applicable requirements for criteria pollutants of carbon monoxide (NR 426 Wis. Adm. Code), sulfur dioxide (NR 417 and 418 Wis. Adm. Codes), lead (NR 427 Wis. Adm. Code) and/or nitrogen oxides (NR 428 Wis. Adm. Code) were all met.

Facilities covered under a ROP are subject to the general limitations in ss. NR 426.03, 417.03, 427.025, and 428.03. In very few instances, facilities can be subject to other sections in these chapters such as:

(a) s. NR 417.07(2)(d)- Fuel burning equipment firing residual fuel oil which has a total heat input capacity on residual fuel oil of less than 250 million Btu per hour.
(b) ss. NR 418.025-418.08 - Specific sulfur limitations for certain facilities located in the cities or villages of Brokaw, Madison, Milwaukee, Green Bay, DePere, Peshtigo, Rhinelander, and Rothschild.
(c) s. 428.04(2)(a)2. - New or modified gaseous fuel fired boilers with a maximum design heat input of 25 million Btu per hour or greater, located in the counties of Kenosha, Milwaukee, Ozaukee, Racine, Washington, or Waukesha.

7. Precautions to prevent or minimize odors (NR 429 Wis. Adm. Code) produced by the operation were taken.

Facilities with production activities that have the potential to cause malodors are responsible for preventing or minimizing them as much as possible. The control of malodorous emissions may include but is not limited to: (1) use of catalytic incinerators, after burners, scrubbers, adsorbers, absorbers or other methods approved by the Department; (2) removal and disposal of odorous materials; (3) use of methods in handling and storage of odorous materials that minimize emissions; and (4) following prescribed standards in the maintenance of premises to reduce odorous emissions. The department also recommends preparing an Odor Control Plan. Facilities causing odor issues are responsible for addressing any complaint received from the public.

8. Proper disposal of wastes was performed (i.e., using a waste hauling or recycling service and not burning wastes as burning is not allowed per NR 429 Wis. Adm. Code).

Facilities cannot burn any waste. All waste shall be disposed properly. For more information about waste disposal visit Waste | Wisconsin DNR.

9. A written malfunction prevention and abatement plan has been prepared, implemented and updated within the past five years (s. NR 439.11 Wis. Adm. Code).

A malfunction prevention and abatement plan is a plan to prevent, detect, and correct malfunctions or equipment failures that may cause any applicable emission limitation to be violated or may cause air pollution. The owner or operator of an air contaminant source that is required to have an air pollution control permit shall prepare and follow a malfunction prevention and abatement plan for each emissions unit, operation, or activity that meets any of the following criteria:

(a) Has the potential to emit hazardous air pollutants listed under section 112 (b) of the Act (42 USC 7412) or hazardous air contaminants under ch. NR 445 for which emission limits have been established by an air pollution control permit.

(b) Emits more than 15 pounds in any day or 3 pounds in any hour of any air contaminant for which emission limits have been established by an air pollution control permit.

Emissions units, operations, and activities that may be excluded from the malfunction prevention and abatement plan are listed in s. NR 439.11(1g) Wis. Adm. Code.

The plan shall include all of the following for each emissions unit, operation, or activity required to be included in the plan:

(a) The maximum intervals for inspection, routine maintenance, and calibration, replacement, or validation of the source, air pollution control equipment, and monitoring equipment.

(b) The maximum interval for inspection, routine maintenance, and calibration, replacement, or validation may not exceed that recommended by the manufacturer unless otherwise specified in a plan prepared under this section. In the event that there is not a maximum interval recommended by the manufacturer, the time between inspection, routine maintenance and calibration, replacement, or validation may not exceed one year.

(c) A description of the items or conditions that will be checked during inspection, routine maintenance, and calibration, replacement, or validation.

(d) A description of the corrective actions that will be taken in the event of a malfunction or failure that results in the exceedance of the applicable emission limitation. These corrective actions shall achieve and maintain compliance with the applicable emission limitations as expeditiously as possible and may not take longer than the time necessary to discontinue operation of the source consistent with safe operating procedures and practices for minimizing emissions.

(e) A description of the activities for routine maintenance, inspection and calibration, replacement, or validation of instrumentation installed and operated to monitor the operation of air pollution control equipment as required under s. NR 439.055 (1m).

(f) Other pertinent information to prevent, detect, and correct malfunctions or equipment failures.

10. Requirements under the 40 CFR Part 68 Chemical Accident Prevention Provisions, including the registration and submission of the risk management plan, as required under 40 CFR 68.150 and 68.160, respectively, were met.

Certain facilities might be subject to the requirements of 40 CFR Part 68 – Chemical Accident Prevention Provisions. This rule applies to the owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115. The full rule can be found here: eCFR :: 40 CFR Part 68 -- Chemical Accident Prevention Provisions.

11. Facility also met the following applicable requirements:

Facilities subject to any other rule that has not been covered within the compliance certification, shall list the rule(s) and indicate the compliance status. For example, facilities that operate gasoline or diesel internal combustion engines should lists. NR 485.055 and indicate the compliance status.

D. Compliance Demonstration Methods - Air Pollution Control Devices Requirements

1. **Air pollution control equipment was in operation at all times the process was in operation, and monitoring and maintenance of the control device was conducted as required in the permit.**

   If operation of a control device is necessary to meet an emission cap or required by any applicable rule/standard, the device shall be operated, monitored, and maintained at all times while the corresponding process is in operation. Registration Operations Permits include the list of allowed Air Pollution Control Devices, and the parameters and frequency of monitoring.

2. **Proper calibration and maintenance of control device and source monitoring instrumentation was conducted as required in the permit.**
   All instruments used for measuring source or air pollution control equipment operational variables shall be calibrated, replaced, or validated at a frequency required by an applicable federal requirement, or, if there is no minimum frequency required by an applicable federal requirement, calibrations, replacements, or validations shall be at least as frequent as one of the following:
   (a) Yearly.
   (b) A frequency based on written manufacturer recommendations.
   (c) A frequency established by operational history that demonstrates compliance with the instrument accuracy requirements in s. NR 439.055(3), Wis. Adm. Code.

3. **Air pollution control equipment met the minimum control efficiency as required in the permit or, if higher, the control efficiency required by a specific rule.**

   Air pollution control devices shall be maintained to control air emission over the minimum control efficiencies listed in the Registration Permit or, if higher, as required by a rule. If the control equipment cannot meet the required efficiency, it shall be repaired or replaced.

E. Compliance Demonstration Methods - Emission Calculations and Testing Requirements

1. **Air emissions to demonstrate compliance with the emissions caps or modeling requirements were calculated using the minimum control efficiencies or alternate control efficiency as allowed in the permit.** ***(Note: This may differ from the Annual Emissions Inventory (AEI) Report calculations.)***

   Refer to Section **A** above and to the Registration Operation Permit Application Guides for information about calculating air emissions. The Small Business Environmental Assistance Program has also developed tools for assisting facilities with calculating air emissions. Air emissions calculated to demonstrate compliance with the permit caps are similar to those included in the Air Emissions Inventory (AEI) Report with the following exceptions:

   (a) Control efficiencies used in the AEI may be higher than the minimum required by the Registration Operation Permits if actual control efficiencies are known.
   (b) AEI requires the inclusion of ALL emission units including fugitive emissions sources. For demonstrating compliance with the permit caps, fugitive emissions and emissions from units listed in Attachment 1 of ROPA, ROPB and ROPG or Attachment 3 of ROPC need not be included in the calculations.

2. **If the facility has equipment that is subject or elected to be subject to any standards, limitations, or permit condition that requires initial or periodic compliance emission testing, the testing was performed in a timely fashion and followed all required testing protocols.**

   Many state and federal regulations require initial and periodic compliance emission testing. Additional information about testing requirements can be found here: SB119.pdf, AM538.pdf, and Electronic Reporting Instructions: Stack Testing Plan and Report Submittal.

F. Continued ROP Eligibility

1. **The facility did NOT make any changes that resulted in the source being classified as municipal solid waste combustion or an infectious waste combustion.**

   "Municipal solid waste combustor" means any solid waste treatment facility that is used to burn municipal solid waste or products derived from municipal solid waste, alone or in conjunction with other materials. "Infectious waste" means solid waste that contains pathogens with sufficient virulence and in sufficient quantity that exposure of a susceptible human or animal to the solid waste could cause the human or animal to contract an infectious disease. Municipal solid waste or infectious waste combustion sources are ineligible for ROP coverage.

2. **The facility did NOT make any changes that made the facility subject to NSPS requirements that are not allowed by the permit.**

   Facilities operating under the ROPA or ROPB coverage can only be subject to a NSPS allowed and identified in those permits. If the facility added an air emission unit subject to a NSPS not allowed in the permit, an application for a different type of permit would be required. For additional information refer to the explanation to Question 4 in Section C above.

3. **The facility did NOT make any changes that made the facility subject to NESHAP requirements that are not allowed by the permit.**

   Facilities operating under the ROPA or ROPB coverage can only be subject to a NESHAP allowed and identified in those permits. If the facility added an air emission unit subject to a NESHAP not allowed in the permit, an application for a different type of permit would be required. For additional information refer to the explanation to Question 5 in Section C above.

4. **The facility did NOT make any changes that affected how the operation is subject to NR 445 Wis. Adm. Code, particularly requiring a site-specific control requirement under BACT or LAER.**

   "Best available control technology" or "BACT" means an emission limit for a hazardous air contaminant based on the maximum degree of reduction practically achievable as specified by the department on an individual case-by-case basis considering energy, economic and environmental impacts and other costs related to the source. "Lowest achievable emission rate" or "LAER" means the rate of emission of a hazardous air contaminant that reflects the more stringent of the following:
   (a) The most stringent emission limitation for the hazardous air contaminant which is contained in the air pollution regulatory program of any state for this class or category of source, unless an applicant for a permit demonstrates that this limitation is not achievable;
   (b) The most stringent emission limitation for the hazardous air contaminant which is achieved in practice by the class or category of source.

   Facilities are ineligible for ROPA, ROPB and ROPC coverage if the emission of any state regulated HAP has increased above the emission threshold in Table A (Columns c to f) of NR 445, and the control requirement for the pollutant is BACT or LAER. The ROPG may hold BACT or LAER conditions but additional permitting is required. For additional information refer to the explanation to Question 3 in Section C above.

5. **If the facility made changes to the stacks or increased air emissions of PM10, SO2, NOx, CO, or Pb over the modeling thresholds in the past year, an air dispersion modeling analysis was conducted prior to implementing such changes to confirm the facility will continue meeting the air quality standards.**

   Facilities operating under the ROP can install new air emission units or make modifications to the existing units or stacks without applying for a new air permit. However, the facility shall confirm that the National Ambient Air Quality Standards will be met after considering the new air emission units or stack modifications prior to commencing construction. A new air dispersion modeling analysis will be required under the following scenarios:

   (a) Maximum controlled emissions[1] from the facility has increased exceeding the thresholds listed in the tables below.

Table 1. Facility that meets the prescribed stack configuration[2].

Pollutant	ROP-A	ROP-8	ROP-C	ROP-G
PM10	> 5 TPY of PM	> 5 TPY of PM10	> 5 TPY of PM10	> 5 TPY of PM10
NOx	N/A	> 25 TPY	N/A	> 25 TPY
S02	N/A	> 25 TPY	N/A	> 25 TPY
CO	N/A	N/A	N/A	> 50 TPY
Pb	> 0.2 TPY	> 0.2TPY	> 0.2 TPY	> 0.2TPY

Table 2. Facility that DOES NOT meet the prescribed stack configuration.

Pollutant	ROP-A	ROPB	ROP-C	ROP-G
PM10	> 5 TPY of PM	> 5 TPY of PM10	> 5 TPY of PM10	> 5 TPY of PM10
NOx	>5TPY	>5TPY	**N/A**	>5TPY
S02	>5TPY	>5TPY	**N/A**	>5TPY

[1] Use the **maximum controlled emission** rate to compare against each annual emission threshold. Multiply the maximum controlled hourly emissions by 8,760 hours per year to obtain the annual emission rate. If it is not physically possible to operate 8,760 hours per year, the facility is allowed to take into consideration realistic operating scenarios.

[2] A facility meets the prescribed stack configuration if all stacks at the facility other than stacks that are general building ventilation or stacks venting emission units excluded from modeling as listed in the Registration Operation Permit can meet all the following:
a) The stacks at the facility must be taller than all buildings on which they are located and all buildings that could significantly influence the stacks' emissions as they spread out from their exhaust points into the surrounding area. A building is considered to influence a stack's emissions if the stack is located within five building heights of that building.
b) All stacks at the facility must discharge upwards (within 10 degrees of vertical).
c) All stacks at the facility must discharge to the atmosphere without alteration of flow due to an obstruction (e.g., rain hat) while the process they serve is operating.

CO	**N/A**	**N/A**	**N/A**	>5TPY
Pb	> 0.2 TPY	> 0.2TPY	> 0.2 TPY	> 0.2TPY

(b) A facility with emissions above the thresholds in Table 2 has changed the stack configuration in such way that the dispersion is reduced. For example, a rainhat was installed on the stack exhaust, the stack was modified to discharge horizontally, the height of the stack was lowered, the velocity of the gas flow decreased, a new building was constructed near the stack, etc.

(c) A facility with emissions above the threshold values in Table 1 and 2 has added new processes, changed the air pollution control, or rerouted the exhaust system that emissions from any stack increased. Facilities covered under ROPA are exempt from repeating a modeling analysis for PM10 if the modeled impact of the emissions, including background concentration, conducted during the initial ROP application review is below the thresholds indicated here: ROPA PM10 Threshold for Future Modeling.

6. If the facility made changes that increased air emissions in the past year, actual emissions were estimated prior implementing such changes to confirm the facility will continue meeting the emissions caps.

Facilities operating under the ROP can install new air emission units or increase production without applying for a new air permit. Prior to implementing such changes, the facility shall calculate the actual and maximum controlled emissions, to confirm the facility will continue meeting the ROP emissions caps and emission limits, and that any new rule such as RACT that depends on emission rates will be met.

G. Recordkeeping Requirements

1. All emissions calculations-related records are maintained and available for review.

Facilities shall maintain all data used for calculating monthly or annual emissions. For example, material usage, emission factors, hours of operation, etc. Such records shall be maintained on at least an annual basis for ROPA and ROPC though it is strongly recommended that facilities keep monthly records to ensure emission caps are not inadvertently exceeded. Records on a monthly basis for ROPB and ROPG are required. In all cases the facility may need to keep records on a shorter frequency if specified by rule.

2. If the facility operates a pollution control device to comply with requirements, all air pollution control device monitoring records are maintained as required in the permit.

Monitoring parameter(s) and monitoring frequencies for air pollution control devices are listed in the table below. All monitoring records, inspection logs, maintenance logs, and any other record required under ch. NR 439 shall be maintained for five years.

Control Device Monitoring Parameters		
If you operate this control device:	**You must monitor this parameter:**	**At this frequency, or more often:**
Centrifugal collector (cyclone)	Pressure drop	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements
Multiple cyclone w/out flyash reinjection	Pressure drop	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements
Multiple cyclone with flyash reinjection	Pressure drop	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements
Wet cyclone separator	Pressure drop and water flow rate	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements
Wall filter, including paint overspray filters and rotary drum filters	Pressure drop **or** Condition of filter including alignment, saturation and tears/holes	Pressure drop: once every 8 hours of source operation or once per day, whichever yields the greater number of measurements Filter condition: once before every day of operation

Control Device Monitoring Parameters		
If you operate this control device:	**You must monitor this parameter:**	**At this frequency, or more often:**
Fabric filter and HEPA filter, including baghouses and cartridge collectors	Pressure drop **or** Output of bag leak detection system	Pressure drop: once every 8 hours of source operation or once per day, whichever yields the greater number of measurements Bag leak detection system: once per day of operation
Spray towers	Pressure drop and water flow rate	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements
Venturi scrubber	Pressure drop and scrubber liquor flow rate	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements
Condensation scrubber (packed bed)	Pressure drop and scrubber liquor flow rate	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements
Impingement plate scrubber	Pressure drop and scrubber liquor flow rate	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements
Electrostatic precipitator	Primary and secondary voltage; primary and secondary current; and sparking rate, in sparks per minute	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements
Thermal oxidizer	Temperature in the combustion chamber	Once every 15 minutes
Catalytic oxidizer	Temperature in the inlet to the catalytic bed; and catalyst bed reactivity	Once every 15 minutes
Condenser	Condenser outlet gas temperature	Once every 15 minutes
Flaring or direct combustor	Presence of flame	Continuous
Bio-filter	Bed temperature, moisture content	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements
Carbon adsorption	Pressure drop, VOC concentration at outlet	Once every 8 hours of source operation or once per day, whichever yields the greater number of measurements

3. If the facility operates a pollution control device to comply with requirements, documentation is available for the recommended operation parameter range(s) for each device.

Facilities shall keep specifications from the manufacturer of the control device indicating the control efficiencies and recommended operation parameter range(s). In the absence of manufacturer's specifications or if required by rule, the facility must keep records of the operation parameter range as determined by stack testing.

4. All records of stack parameters are maintained as required in the permit.

Facilities shall maintain stack parameter records, including blueprints or drawings of stack locations, height and diameter, and gas flow parameters such as temperature and flowrate.

5. If the facility demonstrated initial eligibility for this permit through air dispersion modeling, all records are maintained on the modeling analysis as required in the permit.

Air dispersion modeling analysis is usually conducted by the department or facility during the initial application for ROP coverage. If the facility conducted the modeling analysis, only the modeling results were submitted to the department. Therefore, the facility shall keep and make available to the department upon request all modeling input and output files from the original analysis.

6. **If the facility made any changes in the past year that would increase emissions or affect ambient impact, updated modeling records are available that reflect all changes or modifications and demonstrate continued eligibility for this permit.**

   Facilities that conducted an air dispersion modeling analysis as explained in Questions 6 of Section F above, shall keep and make available to the department upon request all modeling input and output files from the new analysis.

7. **All records required to demonstrate compliance with this permit are retained for a minimum of five years (or any other period allowed by the permit).**

   All records of emission calculations, testing results, monitoring parameters, calibration, etc. shall be maintained for at least five years.

H. Reporting and Notification Requirements

1. **A thorough review of ALL applicable state and federal regulations and permit requirements was performed prior to completing this Annual Compliance Certification which will be submitted by March 1. *Form 4530-179. Annual Monitoring Summary and Checklist, or a similar format is recommended for a thorough review of compliance.***

   The department recommends the following to determine all applicable regulations:

   (a) If available, read previous source-specific permits issued to the facility and find all applicable rules. Although these permits were revoked, most of the permit requirements might still apply to the source. Use the Air Permit Search tool to download copy of the air permit: Air Permit Search | | Wisconsin DNR.
   (b) Read source-specific permits issued by the department to a similar type of facility. Search for facilities with the same NAICS code using the link above.
   (c) Read the Registration Permit Review Memo or Permit Revocation Memo.
   (d) Read Chapters NR 400-499 of the Wisconsin Administrative Code: Wisconsin Legislature: Chapter NR 400.
   (e) Review the list of NSPS and search for U.S. EPA guidance materials: New Source Performance Standards | US EPA.
   (f) Review the list of NESHAP and search for U.S. EPA guidance materials: National Emission Standards for Hazardous Air Pollutants (NESHAP) | US EPA.

   For additional assistance, contact the assigned Air Compliance Inspector, Registration Permits Coordinator, or Small Business | Wisconsin DNR. To find the compliance inspector for a facility, locate the facility here: Permit Tracking Search.

   If you are still unsure what regulations apply to your facility consider hiring an environmental consultant. Search for help from an environmental compliance consultant who can prepare a list of applicable rule and permit requirements. The partial list of environmental consultants can be found here: https://widnr.widen.net/s/kdvrlrrnrc/sb004.

2. **The Air Emissions Reporting and Certification requirement was met for the previous year, or a notification was sent to the department indicating emissions were below reporting levels in NR 438 Wis. Adm. Code.**

   By March 1 of each calendar year, facilities covered under a ROP are required to submit an Air Emission Inventory (AEI) report or, if the emissions were below the reporting levels in NR 438 (438.pdf), an Under Threshold Notification (UTN). The AEI or UTN are submitted using the DNR Switchboard (Switchboard | Wisconsin DNR). If the facility submits an AEI report, it shall be certified by June 30.

3. **If the facility has undergone any change of ownership or control during the previous year, the department was notified as required in the permit.**

   The department shall be notified of any change of ownership or control within 30 calendar days after the change and the notification shall include the transfer date. Follow the reporting process detailed on this webpage: Notifying the Air Program About Administrative Facility Changes | | Wisconsin DNR.

4. **If an air dispersion modeling analysis was conducted in the previous year, Part 1 of Form 4530-156A has been completed and attached to this Annual Compliance Certification.**

   Facilities that conducted an air dispersion modeling analysis as explained in Questions 6 of Section F above, shall complete Part 1 of Form 4530-156A, attach the result to the Annual Compliance Certification, and maintain records of all modeling input and output files.

5. **If any changes were made during the previous year that would cause the facility to become ineligible for the ROP, the proper notification/application procedures were followed - which may include submittal of a new permit application as appropriate.**

   Facilities operating under a ROP can become ineligible for coverage due to situations including, but not limited to:
   (a) Actual emissions increased over the permit caps.
   (b) Change of attainment status of the area where the facility is located, lowering the emission caps.
   (c) Facility became affected by a NSPS or NESHAP that is not allowed by the permit.
   (d) Maximum controlled emissions increased and National Ambient Air Quality Standards (NMQS) cannot be met without having source-specific emission limits.
   (e) Two or more nearby facilities under common ownership or control are determined to be a single source, increasing facility wide emissions over permit caps.
   (f) Emission of state regulated HAPs increased to levels where BACT or LAER control is required.
   (g) Facility covered under ROPC is no longer classified "primarily" as a printer.
   (h) Facility covered under ROPG fails to pursue and achieve Tier 2 of the Green Tier Program or fails to maintain Tier 2 status under the Green Tier Program.
   (i) Facility is reclassified as a municipal solid waste combustion source or an infectious waste combustion source.

6. **If this is a portable facility, a notice for each relocation was provided to the department as required in the permit.**

   Portable facilities shall provide written notice to the department at least 20 days prior to relocation and the relocation may occur only if the department has no objection.

7. **If the facility had a deviation from permit requirements, Form 4530-182 or similar document containing all the same information was submitted to the department.**

   Facilities shall report any event at the source that causes the exceedance of a requirement which limits the quantity, rate, or concentration of emissions of air contaminants, including an event that causes a visible emission limit to be exceeded, within 10 calendar days of the occurrence. The owner or operator of a source shall report to the department all of the following:

   1. The affected emissions unit, operation, or activity.
   2. The pollutant affected and an estimate of excess emissions, including calculations and assumptions.
   3. The date, time, cause, and duration of the exceedance, the period of time considered necessary for correction, and measures taken to minimize emissions during the period.
   4. Any corrective actions or preventative measures that have been or will be taken to prevent future exceedances.
   5. The method used to determine the exceedance.

The responsible official shall electronically sign the notification or mail a copy with an original ink signature to the department.

Section III. Deviation Summary Report

Complete Section III only if the facility indicated "FALSE" to any statement in Section II - Compliance Evaluation. Any determined deviation from Wisconsin or federal air rules needs to be listed in the Deviation Summary Report. A deviation is not necessarily a violation. Violations will be determined by the department. The Deviation Summary Report table is described below:

- **Column A.** Place in this column the rule or permit citation for the requirement(s) which the facility had a deviation from or is currently deviating from. Each different or continuing deviation should be assigned to a unique row. The same deviation occurring over multiple emissions units may be listed in the same row with the corresponding emission unit properly identified. For deviations that apply to the facility as a whole or to all units at the facility, "facility-wide" may be entered in the emission unit column. Additional rows may be added to the Deviation Summary Report by clicking on the box with the plus sign found next to the table's bottom row and the far-right column.

  Examples of citations are:

  - Failure to prevent fugitive dust from a facility may be cited under **NR** 415.04(1) Wis. Adm Code.
  - Failure to meet a facility-wide emissions cap for nitrogen oxides would be cited as Permit condition A.1.
  - Failure for a bulk gasoline plant to perform a monthly leak inspection of all equipment in gasoline service as required by a NESAHP standard would be cited as 40 CFR 63.11086(c).

- **Column B.** In this column, note the emissions unit and identification number (if one is available) or description of the process where the deviation occurred. For example: "Natural gas-fired boiler - B20 - S12"; screen printing unit; dry cleaning washer #1; stack exhausting the wood chip dryer, and so on. The identification system used for the Air Emissions Inventory may be used.
- **Column C.** Note the time period during which the deviation occurred in this column. This may be just one hour on one day, or on multiple days. Each new occurrence of a different deviation should be logged into the report in a separate row. Similar deviations occurring at different times may be logged in on the same row but specify the time period for each deviation.
- **Column D.** List the date the facility previously reported the deviation to the department in this column. Refer to the ROP for facility reporting requirements. Leave this column blank if the facility did not previously report this deviation to the department.
- **Column E.** Describe in this column the deviation from the ROP or other applicable Wisconsin or Federal air rule. For example, a hot mix asphalt plant "failed to perform an annual burner check." as required by ROPA condition A.6.b.
- **Column F.** Use this column to identify how the facility determined that there was a deviation. This might include review of records, an observation, test results, etc. For example: "Review of on-site maintenance log indicated that no burner check was performed on the asphalt plant during the previous calendar year."
- **Column G.** Describe in this column what action or measure was taken by the facility to correct the deviation. For example: "Black light test on May 11, 2020 revealed four ruptured bags in the baghouse. New bags replaced the broken bags on May 20, 2020."

Section IV. Signature of Responsible Official

After completing all questions in Sections II and, if needed, Section **111,** the Responsible Official must certify the compliance status of the facility. Follow these instructions to finalize the compliance certification.

1. Read the Statement of Completeness and check box IV.A.

2. Certify the compliance status of the facility during the reporting period by checking the appropriate compliance status box in IV.B. Two options for the compliance status of the facility are available:

(a) **"Continuous Compliance"** means that NO instances or circumstances of deviation from state or federal air rules were determined after assessing the operation of the facility using Section II of the ROP Compliance Certification (Form 4530-178), Monitoring Summary Checklist (Form 4530-179), and/or any other means of compliance determination.

(b) **"Intermittent Compliance"** means that one or more instances or circumstances of deviation from state or federal air rules were determined after assessing the operation of the facility using Section II of the ROP Compliance Certification (Form 4530-178), Monitoring Summary Checklist (Form 4530-179), and/or any other means of compliance determination. If checking Intermittent Compliance, the Deviation Summary Report in Section Ill must be completed. NOTE: Intermittent Compliance is denoted by checking any "FALSE" box found in Section II. Intermittent Compliance means that a facility is "in compliance with its Registration Operation Permit and any other applicable requirements, except for those deviations identified on the Deviation Summary Report". This may include deviations continuing from a previous reporting period.

3. Enter the Facility Name and Facility Identification Number (FID).

4. Enter the name and job title of the facility's Responsible Official.

5. The facility's Responsible Official shall sign the Compliance Certification using one of the following options:

(a) Electronic signature available through the DNR Switchboard. More information can be found here: https://widnr.widen.net/view/pdf/26ckayqibn/AM572.pdf?t.download=true.

(b) Handwritten ink signature.

Note: Adobe Acrobat signatures and scanned handwritten signatures are not accepted as electronic or handwritten ink signature.

6. Enter the date signed.

7. Submit the signed Compliance Certification electronically using the DNR Switchboard (Switchboard | Wisconsin DNR). Follow the instructions for submitting the form electronically under Compliance Certification here: Air Compliance Submittal Actions Electronic Reporting | | Wisconsin DNR. The report can be uploaded by any person with access to the facility's Air Compliance Reporting system but only the person assigned as Responsible Official can e-sign the report. If using e-signature is not suitable for the facility, the Compliance Certification can be uploaded in the DNR Switchboard and only the signed Section IV- Signature of Responsible Official (Page 5 of Form 4530-178) should be mailed to the following address:

Wisconsin Department of Natural Resources
Air Program
Attn: ROP Comp Certs
101 S Webster St
PO BOX7921
Madison, WI 53707-7921