

Registration Permits Compliance Checklist ¹

Item	Frequency	Due Date	Report Required	Documents Needed	Resources/Comments
The following tasks should be done by all facilities soon after receiving coverage under a registration operation permit (ROP):					
<input type="checkbox"/> Read the ROP	At least once	Within two weeks of receipt	No	Not applicable	Coverage letter sent to responsible official has link to permit. Or download a copy from the appropriate ROP tab on DNR's Registration Permit Webpage (https://dnr.wisconsin.gov/topic/AirPermits/Registration.html).
<input type="checkbox"/> Request access to Air Management Program actions on the DNR's Switchboard, if not already registered.	One time	Before December 31 of the year of registration permit coverage ²	No	No	Create a Wisconsin user ID and request access through DNR's electronic Switchboard (https://dnr.wisconsin.gov/topic/Switchboard). The Wisconsin user ID is required to submit electronic compliance documents, including the air emissions inventory (AEI), compliance certification, stack test results, and others. Review instructions on how to submit electronic documents on the DNR's Air Compliance Submittal Actions Electronic Reporting webpage (https://dnr.wisconsin.gov/topic/AirPermits/ComplianceReports.html).

¹ Additional requirements not listed on this compliance checklist may apply to facilities covered under the Type G registrations permits.

² DNR staff adds basic information to the air emissions inventory based on the facility description. Check this information for accuracy and add other necessary information.

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<input type="checkbox"/> Document search of all applicable requirements (NR 400-499, Wis Adm Code and federal code) to qualify for safe harbor under s. NR 407.105(7). Safe harbor is explained in Section 5, Part 1 of each of the ROP application guides .	Once soon after coverage; periodically for changes.	As soon after coverage under the registration permit as possible	No	Written record of search methods and search results required for facility to be covered by safe harbor	Use revoked air permits for list of applicable air pollution requirements. Or review the Annual Monitoring Summary and Checklist (Form 4530-179 , https://dnr.wisconsin.gov/topic/AirPermits/Forms.html) under Section A.2 for suggestions on rules that might apply depending on facility operations and activities. Review current list of rules soon after ROP coverage. Then review proposed rule list periodically for any changes to DNR applicable requirements. Links to both lists are available on the Air Pollution Control Rules webpage (https://dnr.wisconsin.gov/topic/AirQuality/Rules.html). The DNR's Small Business Environmental Assistance Program (SBEAP, https://dnr.wisconsin.gov/topic/SmallBusiness) can help small businesses understand requirements.
<input type="checkbox"/> Set up a compliance demonstration and recordkeeping plan for each applicable requirement. Common items to keep records of: <ul style="list-style-type: none"> • stack parameter technical drawings • calculation methods • material throughputs • fuel usage • control device parameter monitoring • calibration of parameter monitoring devices 	Initially, then update as equipment or materials are added or changed	As soon after coverage under the ROP as possible	No	Recommended to have a written plan for facility staff. Plan not required by the DNR	If an old air permit is available, start there in developing a compliance and recordkeeping plan. The DNR's SBEAP can help small businesses understand what types of records (https://widnr.widen.net/s/cdhbx8pwr/sb118) might be needed. Chapter NR 439 (https://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf) contains compliance requirements.

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<input type="checkbox"/> Check to see if facility is in a category under Area Source National Emissions Standard for Hazardous Air Pollutants (NESHAP).	One time, at a minimum. Update if operations are changed and applicability is affected.	Each rule has specific notification and compliance dates	Depends on the rule and compliance dates in each	<ul style="list-style-type: none"> Initial Notification that you are subject to a NESHAP Compliance Notification³ Annual Compliance Certification (some) 	<p>U.S. EPA's toxics website (https://www.epa.gov/stationary-sources-air-pollution/national-emissions-standards-hazardous-air-pollutants-area-source) has fact sheets and final rules. If the facility is in one of the listed source categories, download the rule. Search: Am I subject to this Subpart?</p> <p>Additional information on submitting the initial and compliance notifications can be found under "When must sources comply with a NESHAP?" (https://dnr.wisconsin.gov/topic/AirQuality/HAPFAQ.html)</p>
<input type="checkbox"/> Make a list of the control device parameter ranges for each control device. (Facilities without control devices do not need to do this.)	One time, at a minimum. Update as equipment is added or changed.	As soon after coverage under the registration permit as possible	No	Keep the list of parameter ranges on site	<p>Control device parameters that must be monitored and recorded are in Condition E.8 Table 2 of the Type A, B and G registration permits, or Condition E.13 of the Type C registration permit.</p> <p>Section NR 439.055 (https://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf) contains specific requirements for control device monitoring.</p>
<input type="checkbox"/> Prepare a malfunction prevention and abatement plan as required in NR 439.11 Wis. Adm. Code.	Update every five years, or upon installation of new equipment.	As soon as possible after installation of new equipment	No	Keep plan on site for review	<p>Section NR 439.11 (https://docs.legis.wisconsin.gov/code/admin_code/nr/400/439.pdf) contains specific requirements for malfunction prevention and abatement plans.</p>

³ Initial Notification and Compliance Notifications shall be sent to the U.S. EPA through their Electronic Reporting Tool (ERT), and some may also need to be submitted to the DNR – check the [NESHAP FAQs](https://dnr.wisconsin.gov/topic/AirQuality/HAPFAQ.html) (<https://dnr.wisconsin.gov/topic/AirQuality/HAPFAQ.html>) for more information on where to submit a notification.

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Item	Frequency	Due Date	Report Required	Documents Needed	Resources/Comments
The following tasks need to be done each year so you can submit compliance certifications and annual inventory reports:					
<input type="checkbox"/> Perform compliance audit to determine compliance status with each applicable requirement. ⁴	At least annually	Prior to submitting annual compliance certification	No	Keep documents used to determine compliance	<p>Use the facility's compliance demonstration and recordkeeping plan. Use the Monitoring Summary and Checklist (Form 4530-179 https://dnr.wisconsin.gov/topic/AirPermits/Forms.html) as a guide for elements to evaluate for compliance status.</p> <p>DNR's SBEAP (https://dnr.wisconsin.gov/topic/SmallBusiness) can help small businesses.</p>
<input type="checkbox"/> Calculate actual emissions ⁵ of PM/PM ₁₀ , SO ₂ , NO _x , CO, VOC, hazardous air pollutants (HAPs), and lead. <p>NOTE: 1-Bromopropane (1-BP), CAS #106-94-5, also known as n-propyl bromide, was added to the HAPs listed under section 112(b) of the Clean Air Act, effective February 4, 2022.</p>	<p>Annually for ROPA and ROPC</p> <p>Monthly for ROPB and ROPG</p>	Prior to submitting annual Air Emissions Inventory report.	No	<p>Keep records of material/fuel usage, etc., used in emissions calculations.</p> <p>Keep sample calculations.</p> <p>Copies of Safety Data Sheets (SDS) for coatings, solvents, fuels used.</p>	<p>The ROP Application Guides contain information on calculating facility wide actual annual emissions. The guides are available on the appropriate ROP tab on the DNR's Registration Permit Options webpage (dnr.wisconsin.gov/topic/AirPermits/Registration.html).</p> <p>Example calculations are available in the SBEAP spreadsheet SB-301.</p> <p>The new HAP 1-BP may be found in solvent degreasers, adhesives, furniture foam fabrication and chemical intermediates. For more information, visit Air News: 1-Bromopropane Added To List Of Hazardous Air Pollutants and EPA's 1-BP Q&A (https://content.govdelivery.com/accounts/WIDNR/bulletins/317a38e) document.</p> <p>If the facility exceeds the ROP emissions limit for HAPs with the inclusion of 1-BP, review the need to apply for a different permit. Applications for source classification changes resulting from 1-BP emissions are due no later than February 4, 2023. Contact the ROP program coordinator at DNRamROPSairpermit@wisconsin.gov for details.</p>

⁴ Additional environmental audits are required for facilities covered under the Type G registration permits. Contact the Green Tier Program for more details.

⁵ Facilities using air pollution control devices shall meet the minimum control efficiencies listed in the ROP. If the control efficiencies are above the minimum required, facilities still need to use the control efficiencies listed in the ROP for the calculation of actual emissions.

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<input type="checkbox"/> Calculate emissions from individual process lines if necessary. For example: demonstrate RACT exemptions, LACT 10 ton/yr limit, and NR 445	Frequency determined by individual applicable requirement.	Prior to submitting Compliance Certification	Where indicated in the rules	Keep records of data used to calculate emissions and samples of how calculations were made	DNR's SBEAP (https://dnr.wisconsin.gov/topic/SmallBusiness/Resources) has links to calculation worksheets and fact sheets on many regulations on industry specific pages, or visit the Compliance Resources webpage (https://dnr.wisconsin.gov/topic/SmallBusiness/Compliance.html).
<input type="checkbox"/> Submit annual air emissions inventory (AEI) report. Remember to include 1-BP emissions on report.	Annually	March 1	Yes If emissions are below reporting thresholds, submit Under Threshold Notification (UTN).	Use DNR's On-line Air Reporting System (ARS) to complete either the AEI report or the UTN.	Obtain a Wisconsin user ID and request access through DNR's electronic Switchboard (https://dnr.wisconsin.gov/topic/Switchboard). Air emissions inventory resources (https://dnr.wisconsin.gov/topic/AirEmissions). Chapter NR 438 (https://docs.legis.wisconsin.gov/code/admin_code/nr/400/438.p df) contains reporting requirements and thresholds. A 15-day extension to the submittal of the AEI report may be requested by using the Annual Reporting System (ARS) accessed through the Switchboard . Facility contact information (https://widnr.widen.net/s/zptgrfs5r8/am628) must be updated prior to the submittal of an AEI report or UTN. Additional assistance on completing AEI report is available on the Air Emissions Inventory Updates, Tutorials, FAQ and Help (https://dnr.wisconsin.gov/topic/AirEmissions/Tutorials.html) webpage.

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<input type="checkbox"/> Submit annual compliance certification	Annually ⁶	March 1 – for previous calendar year	Yes Upload report through Switchboard and sign electronically ⁷	Use DNR's Comp. Cert and Monitoring Summary Deviation Form (Forms 4530-178) or similar documents. Upload using the DNR's Switchboard	Form 4530-178 (https://dnr.wisconsin.gov/topic/AirPermits/Forms.html) and instructions (https://dnr.wisconsin.gov/sites/default/files/topic/AirPermits/4530-178instructions.pdf) for 4530-178 For information on electronic submittal and e-signature, as well as Air Compliance Submittal Actions and uploading documents electronically, visit the Air Compliance Submittal Actions Electronic Reporting webpage (dnr.wisconsin.gov/topic/AirPermits/ComplianceReports.html).
<input type="checkbox"/> Submit summary of monitoring ⁸	Annually	March 1 – for previous calendar year	Yes Upload report through Switchboard	If not using Form 4530-178, combine the compliance certification and the summary of monitoring documents, and upload as single PDF file in Switchboard	The ROP Monitoring Summary/Checklist (Form 4530-179 https://dnr.wisconsin.gov/topic/AirPermits/Forms.html) can be submitted to satisfy this requirement. For additional information about air compliance submittal actions and uploading documents electronically visit DNR's Air Compliance Submittal Actions Electronic Reporting (https://dnr.wisconsin.gov/topic/AirPermits/ComplianceReports.html) webpage.

⁶ If the facility had permits revoked prior to coverage under the ROP, the facility should submit compliance certification and monitoring reports regarding compliance with the old permit conditions covering the time period that the old permit was in effect. Facilities covered under the ROP A and ROP C must begin submitting the compliance certification and monitoring reports after the first full calendar year of coverage.

⁷ The compliance certification report can be uploaded in Switchboard by any authorized personnel, however, only the responsible official on record can certify the accuracy of the report using e-Signature.

⁸ Facilities that submit Form 4530-178 are exempt from the submittal of a separate annual summary of monitoring.

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<input type="checkbox"/> Pay annual Emission Fees (\$400 per year)	Annually	June 30	No	Keep copy of the invoices and receipt of payments	Air emission fees can be paid either online at http://dnr.wi.gov/epay/ (https://docs.legis.wisconsin.gov/statutes/statutes/285.pdf) or by check. Rules governing emission fees are found in the Wisconsin Statutes, s. 285.69 (docs.legis.wisconsin.gov/statutes/statutes/285.pdf).
These tasks will need to be done if circumstances warrant:					
<input type="checkbox"/> Submit name change in case of change of ownership or legal control	Upon change	Within 30 calendar days of the change	Yes	Yes	Submit information following the instructions on DNR's Notifying the Air Program About Administrative Facility Changes webpage (https://dnr.wisconsin.gov/topic/AirPermits/Changes.html).
<input type="checkbox"/> Update the name and contact information of corporate officials	Upon change	Immediately	Yes	Send updated information as directed on Changes webpage or update through ARS in Switchboard.	Submit information to the ROP Program Coordinator at DNRamROPSairpermit@wisconsin.gov . Required contact information includes: name, title, phone number, mail address, and e-mail address. Submit information following the instructions on DNR's Notifying the Air Program About Administrative Facility Changes webpage (https://dnr.wisconsin.gov/topic/AirPermits/Changes.html). Update contacts information (https://widnr.widen.net/s/zptgrfs5r8/am628) in the Annual Reporting System (ARS) accessed through Switchboard (https://dnr.wisconsin.gov/topic/Switchboard).

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<input type="checkbox"/> Facilities that are required to model – Report change that triggered modeling. <input type="checkbox"/> Submit modeling results	With annual compliance certifications	March 1 The year after the change was made	Yes	Use Parts 1 and 2 of the ROP Modeling Assessment Attachment (Form 4530-156A)	Submit modeling results as part of the annual compliance certification and monitoring report. Form 4530-156A (https://dnr.wisconsin.gov/topic/AirPermits/Forms.html) is available on DNR's Air Permit and Compliance Forms webpage.
<input type="checkbox"/> Portable sources⁹ only – Submit relocation notices	Upon relocation	At least 20 days prior to relocation.	Yes	Submit letter or DNR form 4500-025. Upload in Switchboard.	Use Form 4500-025 (https://dnr.wisconsin.gov/topic/AirPermits/Forms.html) and upload through Switchboard (https://dnr.wisconsin.gov/topic/Switchboard). For additional information about air compliance submittal actions and uploading documents electronically (https://dnr.wisconsin.gov/topic/AirPermits/ComplianceReports.html) visit DNR's webpage.

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⁹ A portable source is one that emits air pollution while standing still but is capable of being moved from place to place such as portable diesel generators, asphalt plants, and stone crushers.