

AIR MANAGEMENT PROGRAM FACT SHEET



Type B Registration Permit

December 2021

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 DNR's traditional permit program to the Registration Permit Program. 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.

What are benefits of the 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 record keeping 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 percent of the major source threshold, except for lead emissions.

Pollutant	Eligibility Threshold
Particulate matter (PM) less than 10 microns (PM10)	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: Visit EPA's webpage for a [list of federally regulated HAPs](#).

What are the differences between Type A and Type B ROPs?

Aside from the emissions thresholds for eligibility, the Type A and Type B ROPs are very similar. However, the Type B ROP has some 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 that 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 DNR 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:

- Visit the [Air Registration Permits](#) webpage.
- Review the [final ROP B](#).
- Contact the Registration Permit Coordinator at DNRRamROPSairpermit@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. This guidance does not establish or affect legal rights or obligations and is not finally determinative of any of the issues addressed. This guidance does not create any rights enforceable by any party in litigation with the State of Wisconsin or the Department of Natural Resources. 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
Air Program
Box 7921- AM/7
Madison, WI 53707
PHONE 608-266-7718 • FAX 608-267-0560
Publication AM-531 2021