

How to Certify Compliance with the Registration Operation Permit

This resource tool has been developed by the Wisconsin Department of Natural Resources (Department) to assist facilities operating under a Registration Operation Permit with their annual monitoring summary and compliance certification requirements in Part I, Section F.1., of Type A and C Registration Operation Permits. This compliance and monitoring resource tool is designed to guide a wide variety of facilities through the air rules from Chapters NR 400-499, Wisconsin Administrative Code (Wis. Adm. Code) which may apply to them. In completing this document and submitting it to the Department, the permittee will be satisfying their annual certification obligations contained in the Registration Operation Permit (Note: This form does not serve to fulfill your annual Consolidated Reporting (e.g. Air, HW, WW, etc.) for Air Emissions Inventory requirements which is due by March 1 of every year. See <http://dnr.wi.gov/topic/AirEmissions/> for assistance on annual reporting of your air pollution emissions).

This resource has three parts: (1) Section A is the compliance certification and monitoring reporting form (combined), (2) Section B is the Deviation Summary Report, and (3) Section C is the compliance checklist. Section C of this document is designed to be a resource tool which follows the format of the Type A Registration Operation Permit and can act as a checklist guiding a facility through the potential applicable rules. For printing facilities with Type C Registration Operation Permits, instead of referencing Section C, reference the Printer Compliance Assistance materials found on <http://dnr.wi.gov/topic/CompAssist/sb/ERP.html#tabx2>.

1. General Instructions

- It is best to become familiar with the contents of the entire document before beginning to use it.
- You may find it helpful to complete the compliance checklist (Section C) first as the conclusions reached here may be useful in completing the Deviation Summary Report (Section B) and the compliance certification and monitoring reporting form for your facility (Section A).
- Section C is not required to be completed but provides an explanation of all applicable requirements that you are certifying to in Sections A and B. If completed, you may wish to retain a copy of Section C for your records.
- For facilities covered under a Type A Registration Operation Permit, the completed form in Section A and B (if needed) needs to be sent to the Department by March 1 of every year. For printing facilities covered under a Type C Registration Operation Permit, the completed form needs to be sent to the Department by June 30 of every year.
- Retain on-site a copy of all materials submitted to the Department for at least five years.

2. Instructions for Section A – Compliance Certification and Monitoring Report, #4530-178

- Permit information can be found in the Department letter sent to you approving the Registration Operation Permit coverage for your facility. Locate your Approval Letter. If you cannot locate your approval letter, it is available on the Department's website using the permit tracking search tool http://dnr.wi.gov/cias/am/amexternal/AM_PermitTrackingSearch.aspx
- The "Facility Identification Number" (FID) is found near the top right portion of the Approval Letter.
- The "Date of Permit Coverage" is the date 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.
- Item 7 inquires whether or not your 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.
- Before beginning to fill out the appropriate response for each question listed in Item 8, you can complete the compliance checklist in Section C and use that information for Item 8. For each question you have the option of checking "YES", "NO" or "NA". You may check the appropriate box or print/type in your answer, e.g., "Yes", in the box. NA means "Not applicable".
- After completing Item 8, you certify the compliance status of your facility in Item 9. After reading the Statement of Completeness, check the box in 9.A.
- Two options for the compliance status of your facility are available and are defined as follows:
 - **Continuous Compliance** means that **NO** instances or circumstances of deviation from Wisconsin or Federal air rules were determined after assessing the operation of your facility using Section C or any other means of compliance determination.
 - **Intermittent Compliance** means that one or more instances or circumstances of deviation from Wisconsin or Federal air rules were determined after assessing the operation of your facility using Section C or any other means of compliance determination. If checking Intermittent Compliance, the Deviation Summary Report found in Section B must be completed. NOTE: Intermittent Compliance is denoted by checking the second box found in 9.B. Intermittent Compliance means that a

**Instructions for Form 4530-178, 4530-178A, 4530-179,
Air Pollution Registration Operation Permit (ROP)
Compliance Certification, Monitoring, and Deviation
Summary Reports and Compliance Checklist**
(R 12/12) Page 2 of 3

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.

- Check the appropriate compliance status box for your facility. This certification must be signed by the facility's Responsible Official. The Responsible Official should date and print/type and sign his/her name and job title.
- Send a copy of the form to the Department's Air Management Compliance Engineer responsible for your facility. The name of the responsible Compliance Engineer and the address for mailing the form to can be found in the Registration Operation Permit Approval Letter or can be found on the Department's website using the permit tracking search tool http://dnr.wi.gov/cias/am/amexternal/AM_PermitTrackingSearch.aspx.

3. Instructions for Section B - Deviation Summary Report

- Any determined deviation from Wisconsin or Federal air rules needs to be discussed in the Deviation Summary Report. A deviation is not necessarily a violation. Violations will be determined by the Department.
- Column 1. Place in this column the rule or permit citation for the requirement(s) which your 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 your facility, you may enter "facility-wide" in the emission unit column. You may add more rows to the Deviation Summary Report 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 could be cited as NR 415.04(1).
 - Failure to meet a facility-wide emission limit 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 MACT standard would be cited as 40 CFR 63.11086(c).
- Column 2. 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. You may use the identification system used for reporting your Air Emissions Inventory.
- Column 3. Note the time period during which the deviation occurred in this column. This may be just one hour on one particular 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 4. List the date the facility previously reported the deviation to the Department in this column. See Part II, Section D of your Registration Operation Permit for facility reporting requirements. Leave this column blank if the facility did not previously report this deviation to the Department.
- Column 5. Describe in this column the deviation from your Registration Operation Permit 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 Registration Operation Permit condition A.6.b.
- Column 6. Use this column to identify how you 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 7. 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, 2012 revealed four ruptured bags in the baghouse. New bags replaced the broken bags on May 20, 2012."
- Once all deviations have been listed in the Deviation Summary Report, date, and print/type and sign your name and title as the responsible official at the end of the DSR. If deviations occurred during the past calendar year, a copy of the signed DSR must accompany the compliance certification and monitoring report found in Section A.

4. Instructions for Section C - Compliance Checklist

- The monitoring summary and checklist consists of different categories (A.1. – F.), which are further sub-divided into a series of questions (each question is assigned to an individual row) that need to be answered. The questions are always found in Column a., of each row. (The heading for Column a., will change as you go through the tables.) If a particular question doesn't apply to your facility please check the "**Not Applicable**" box in the appropriate row and far right column (Column d.)

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Air Pollution Registration Operation Permit (ROP)
Compliance Certification, Monitoring, and Deviation
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(R 12/12)

Page 3 of 3

- The second column (Column b) of each row may or may not contain a web link or information that can help you with the question of concern. Where available, click on the web link to find out more information pertaining to the question of concern. The heading for Column b does change once starting with Section B.
- The third column (Column c) of each row is where you indicate how compliance is achieved with the applicable requirement of concern. Depending upon the question you may be asked to provide a description or process number for each source affected by the requirement, the method of complying with the requirement, and so on. See examples given on the form.
- For each row, check the status of compliance in the far right column (Column d) of the row for the question being asked. Depending on the question click the box for "YES" or "Continuous" if in compliance with the requirement. Click "NO" or "Intermittent" if there is not continuous compliance with the question. Definitions of Continuous and Intermittent Compliance are found in Step 2 of these instructions.
- If you answer "NO" or "Intermittent" to a question go to the Deviation Summary Report in Section B and describe the non-compliant situation. Instructions regarding the Deviation Summary Report are found above in Step 3 of these instructions.
- Use the data from your air emission inventory reporting for questions A.1. (#1-7) of the compliance checklist.