



Revised Registration Permit Allows NESHAPs

The Department of Natural Resources (DNR) Air Program published a draft revision of its Registration Operation Permit (ROP) on March 6, 2009. Following a 30-day public comment period, the final revised ROP will be issued. The revised ROP will allow businesses affected by certain US Environmental Protection Agency (EPA) standards to apply for the ROP. These EPA standards include the National Emissions Standards for Hazardous Air Pollutants or NESHAPs affecting area sources, which are small emitters of hazardous air pollutants, and New Source Performance Standards or NSPS.

The EPA standards included in the ROP, numbered ROP-A03, include:

- Plating and Polishing Operations
- Nine Metal Fabrication and Finishing Source Categories including
 - Electrical and Electronic Equipment Finishing Operations
 - Fabricated Metal Products
 - Fabricated Plate Work (Boiler Shops)
 - Fabricated Structural Metal Manufacturing
 - Heating Equipment, except Electric
 - Industrial Machinery and Equipment Finishing Operations
 - Iron and Steel Forging
 - Primary Metal Products Manufacturing
 - Valves and Pipe Fittings
- Chromium electroplating and anodizing operations which are not major sources or located at major sources and which are any of the following:

(continued on page 2...)

Notification and Compliance Deadlines for Recent NESHAPs

A number of the area source NESHAP issued in 2008 had very short deadlines by which the affected sources needed to submit a notification to EPA. Yet, many still have two to three years before the sources must comply with all the requirements.

A table provided on page 2 shows some of the recent regulations and when notifications are due to EPA and DNR, and the date when sources must comply. There are usually two notifications due to EPA and DNR, one to indicate you are affected by the rule and a second to indicate you have complied with all requirements. ❖

In This Issue...

Article	Page
---------	------

Revised ROP.....	1-2
------------------	-----

Deadlines for Recent NESHAPs.....	1
-----------------------------------	---

Table of Recent NESHAPs Deadlines..	2
-------------------------------------	---

Ozone Attainment Designation Changes..	3
--	---

Web Training for Air Emissions Reporting Changes.....	3
---	---

What Environmental Permits and Approvals Do You Need?.....	3
--	---

Financing Idle Reduction Technologies.....	4
--	---

Available From the Small Business Clean Air Assistance Program...

✓ Compliance Calendars for Gas Stations, Dry Cleaners

✓ Environmental Information Summary

To order a print copy: call (608) 264-6153 or (608) 267-9214; fax (608) 264-6151; or email COMCleanAir@wisconsin.gov

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(cont. from Page 1)

- Any decorative chromium electroplating operation or chromium anodizing operation that uses fume suppressants as an emission reduction technology
- Any decorative chromium electroplating operation that uses a trivalent chromium bath that incorporates a wetting agent as a bath ingredient
- Spark Ignition Internal Combustion Engines - only for the owner/operator of manufacturer-certified affected engines
- Ignition Internal Combustion Engines - only for the owner/operator of manufacturer-certified affected engines that are 2007 model year or later with displacements less than 30 liters per cylinder

The reason sources affected by these EPA rules are allowed to use the ROP is that the conditions in the standards are fairly simple to follow, are close enough to standard operating practices for the industry that they are easy to comply with, and also the EPA has prepared plain-language brochures to describe what a source needs to do. EPA brochures can be found here:

<http://www.epa.gov/ttn/atw/area/arearules.html>. Click on the link for "implementation tools" at the top of the page. The newest materials are posted at the top of that table.

Also, the Small Business Clean Air Assistance Program (SBCAAP) has developed additional fact sheets or other tools explaining some of these rules on its Air Toxics page under Area Sources:

http://commerce.wi.gov/bd/BD-CA-Air_Toxics.html. With all these resources at their disposal, an area source affected by the listed NESHAP should not have difficulty coming into compliance when they are issued an ROP by DNR. ❖

Recent Area Source NESHAPs Issued by EPA

Rule - Source Category	Date Issued	Initial Notification Due	Compliance Deadline	Notification of Compliance Status Due
Iron and Steel Foundries	Jan. 2, 2008	Applicability: May 1, 2008 Size Classification: Jan. 2, 2009	Management Practices - scrap and binder: Jan. 9, 2009 - mercury switch removal: Jan. 4, 2010 Emission standards: Jan. 2, 2011	Management Practices - scrap and binder: Feb. 1, 2009 - mercury switch removal: Feb. 3, 2010 Emission standards: July 31, 2011
Paint Stripping and Surface Coating	Jan. 9, 2008	January 11, 2010	January 10, 2011	March 11, 2011
Plating and Polishing	July 1, 2008	October 29, 2008	July 1, 2010	July 1, 2010
Nine Metal Fabrication and Finishing Operations	July 23, 2008	July 25, 2010	July 25, 2011	November 22, 2011



Hot Topics in DNR's Air Program

Check them out at <http://dnr.wi.gov/air/> under News.

Recent Attainment Designation Changes

DNR made an initial attempt to change the designation of Kenosha, Milwaukee, Ozaukee, Racine, Washington and Waukesha counties to attainment for the one-hour standard for ozone in 2001, but a violation of the standard in 2002 halted that effort. Recently, DNR announced that by using data from 2003-2005 they are able to meet the one-hour standard in those counties. This does not impact the designations of nonattainment under the 8-hour ozone standard.

With new lower standards for PM_{2.5}, or particulate matter less than 2.5 microns in size, EPA designated the following counties as nonattainment for the standard: Brown, Columbia, Dane, Milwaukee, Racine, and Waukesha. After reviewing data from 2006-2008, DNR requested that EPA change the designation for Brown and Dane counties and also Paris Township in Columbia County.

EPA establishes the levels for all National Ambient Air Quality Standards for criteria pollutants. ❖

Web Training Available for Updates to Air Emissions Reporting System

The system used by facilities to report their air pollution emissions every March was updated again for 2008 reporting. The reporting software was integrated into DNR's online system. You can now manage your facility's Air Pollution reporting, permits, and compliance information on the web.

To learn more about the changes to the system, DNR's training video may be viewed here:

http://dnr.wi.gov/air/emission/crs/mediasite_01_15_09.htm. Questions about your air emissions report may be directed to: Ralph Patterson, DNR, 608.266.2060 or emailing Ralph.Patterson@wisconsin.gov. ❖

What Permits and Approvals are Needed Before You Break Ground?

Since each situation is unique, you should always review the range of programs that require environmental permits or approvals before you break ground on a new facility or install new operations at an existing facility. There may only be one or two permits or approvals needed, but if they are not obtained at the right time you could be subject to fines. The requirements may stem from EPA, DNR or even municipal laws or ordinances.

Some activities that may trigger permits or approvals include: grading near or dredging in waterways, filling wetlands, razing or renovating old structures, cleanup of contaminated property, erecting new structures, adding parking spaces/structures, discharging wastewater. You can find this list on the Environmental Information Summary page at <http://commerce.wi.gov/bd/BD-CA-EnvInfoSummary.html>, or there is a printable, shortened version of the list at: <http://commerce.wi.gov/BDdocs/BD-CA-EnvInfoSummChecklist2.pdf>. ❖

Financing Idle Reduction Technologies

In 2006 the Department of Commerce began administering the Diesel Truck Idling Reduction Grant Program. Under the program, Commerce provides grants to freight motor carriers (common, contract and private motor carriers) headquartered in Wisconsin to purchase and install idling reduction units for newer truck tractors.

Idling reduction units provide an alternative source of power used to heat, cool, or provide electricity to the cab or other parts of a truck in lieu of operating the truck's main drive engine to power these services. The use of idling reduction units on heavy-duty diesel trucks saves fuel and lowers air pollution emissions.

Since the program's inception, Commerce has assisted Wisconsin motor carriers in the purchase of almost 1,100 idle reduction units. Commerce estimates that over 2 million gallons of fuel has been saved over the last three years as a result of the grant program.

Building on the success of Wisconsin's program, other financing programs have been created to help motor carriers finance idle reduction equipment:

1. Owner Operator Independent Drivers Association (OOIDA) Rebate-Loan Program: OOIDA members are eligible for up to a 40 percent grant for the purchase of an auxiliary power unit. OOIDA has approximately \$350,000 in 2009 to fund projects. For more information visit the OOIDA website at: http://www.oida.com/Benefits/Truck_Finance/APU%20Grant%20APP.pdf or contact the OOIDA Equipment Finance Department at 800/444-5791.

2. Diesel Emission Reduction Act (DERA) grants will soon be available through the DNR. Through the federal stimulus package, the DNR estimates that there will be at least \$1.7 million available in diesel emission reduction grants. Funding will be available for the purchase of idle reduction technologies, diesel exhaust retrofit equipment and engine replacement and repowers (off-road). For more information visit the DNR website at <http://dnr.wi.gov/air/mobile/CleanDieselGP.htm> or contact Jessica Lawent at 414/263-8653.

To learn more about diesel financing resources, please visit EPA's National Clean Diesel Campaign webpage at <http://www.epa.gov/cleandiesel>. ❖



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