



Wisconsin

Permit Streamlining



WI Air Program

- Air Permit Improvement Initiative Started in July 2003.
- Primary Goals:
 - Decrease the time required to process permits.
 - Help regulated facilities to more easily find out and to understand what air regulations apply to their facility and how regulations translate into permit requirements.
 - Use integrated information management systems, smart systems, and the Internet as major tools to improve permits.
 - Involve stakeholders in the actual design of the needed process improvements in a collaborative manner.
 - Make it easier for the public to understand the permitting process, regulations, and how they can participate.

New Permit Concepts

- **Traditional Permit Concepts:**
 - Registration Permits (new for WI)
 - General Permits (expand program)
 - Consolidated Title V permit
- **Alternative Permit Concepts**
 - Environmental Results Program or ERP (pilot for printers)
 - EMS-Title V permit (pilot for printers)
 - “Bubble” permit

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Traditional Permits

Registration Permits

- Final Rule expected mid June (2005), Issue Permits in September
- Registration Operation Permit (ROP)
 - cap emissions <25% of major source thresholds and annual records to demonstrate
 - make changes without construction permit, if stay below cap!!
 - set stack criteria to protect AAQS
 - no source specific conditions included in permit (draft permit is ~10 pages, including appendices)

Registration Permits

- ROP continued
 - only certain NSPS sources are eligible and no MACT sources
 - issue to individual sources within 15 days from application
- Registration Construction Permit (RCP)
 - similar to ROP, except for cap
 - cap is applied to the project, where emissions must stay below 25% of major source threshold and whole facility cannot become major after project complete

General Permits

- Have select GOP already issued, but most are rarely used
 - crushers, ETO sterilizer, boilers/heating units
- Considering more categories for GOPs
 - printers
 - asphalt plants
 - single process types (e.g., generators)
 - grain handling

Consolidated Title V

- WI Industry wants a “consolidated” permit
 - always refer to neighboring MN permit program
 - dialog on what “consolidated” permit will mean for WI begins summer 2005

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Alternative Concepts

Printer Pilots

- Under State Innovation Grant, pilot both ERP and EMS-Title V permit for printers
 - ERP will be multimedia and include printers up to 50% of major source threshold for air pollutants
 - EMS-Title V permit pilot to use WI Green Tier program to gain flexibility under Title V program

Bubble Permit

- WI bubble permit concept unique
 - cap emissions from whole facility, lower than required by regulations
 - allowed to make changes to processes under that cap without construction permit (or gain flexibility under construction permit requirements)
 - will require rule changes to allow more wide spread use in WI

Other Elements

- Public Involvement
 - improve readability of documents for public use
- Information Technology and Process
 - use of IT in permit process, including application submittal, review of application, and final issued permit
- Change Management
 - what program changes are needed to ensure streamlining concepts succeed

More Information

- <http://dnr.wi.gov/org/aw/air/apii/update/>
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