

Michigan Department of Environmental Quality, Air Quality Division
M-001 Form Instructions

An EQP 5775 Form, entitled "M-001: RULE 215 CHANGE NOTIFICATION OR RULE 216 AMENDMENT/MODIFICATION APPLICATION" (M-001), must be completed to identify changes at a stationary source after a Renewable Operating Permit (ROP) is issued. Notification of changes or application for amendments and modifications to an ROP are required by R 336.1215 (Rule 215) and R 336.1216 (Rule 216), promulgated pursuant to Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. For additional guidance, refer to the detailed instructions that follow for each subrule provision and to the Michigan Department of Environmental Quality's "Life After ROP" Workbook, which is available through the Internet at:

http://www.michigan.gov/documents/deq/deq-ead-caap-rop-LifeAfterROPWorkbook_312634_7.pdf

Because each category of change triggers different requirements and timeframes, each submittal for a change or modification must be provided on a separate M-001 Form. If more than one box is checked in Item 7, the application will be returned for correction. However, multiple changes of the same type may be submitted in the same application. For example, two or more Permits to Install (PTIs) may be included in the same minor modification application if all necessary information is included for each of the PTIs identified in that application.

An applicant may voluntarily choose to combine different types of change under the most "stringent" applicable submittal type, with the understanding that the timeline for that category now applies to all changes within that application. For example, a change to fix a typo in an ROP qualifies as an administrative amendment, but may be combined with a PTI in a submittal for a minor modification request.

If any of the required information is not adequately provided in the application, the application will be returned as incomplete. If additional space is needed, complete an Additional Information Form (AI-001).

Rule 215 notifications must be submitted to the appropriate AQD District Offices and to the United States Environmental Protection Agency (U.S. EPA). Rule 216 applications for ROP revisions should be submitted to the AQD Cadillac District Office. See below for further information.

Items 1 through 7 and 14 must be completed for all submittals. Completion of Items 8 through 13 depends on the type of submittal. Rule 216 applications should include a mark-up of the affected pages of the existing ROP.

Item 15 is optional to submit the M-001 Form and a mark-up of the existing ROP as an update to a previously submitted ROP renewal application in addition to modifying the existing ROP.

See the detailed instructions that follow.

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1. **SRN** – Enter the State Registration Number (SRN) assigned to the source.
2. **ROP Number** – Enter the ROP Number (e.g. MI-ROP-Z999-2012).
3. **County** – Enter the county name where the source is located.
4. **Stationary Source Name** – Provide the specific name that identifies the stationary source associated with the application (e.g., plant name).
5. **Location Address** – Enter the street address for the physical location of the source identified above.
6. **City** – Enter the city name where the source is located.
7. **Submittal Type** – Select the box that describes the type of submittal. Only one box may be selected. For more information, see the detailed instructions that follow for each submittal type and the Clean Air Assistance Program’s “Life After ROP” Workbook.
 - **Rule 215(1) Notification of Change:**
 - Under Rule 215(1)(a), changes are allowed that would “contravene” a specific ROP condition provided that the specified criteria are met. This category is tightly constrained to changes such as identifying the brand of paint used.
 - Under Rule 215(1)(b), changes are allowed for the trading of emissions within a stationary source where allowed by a federally-approved State Implementation Plan (SIP).
 - **Rule 215(2) Notification of Change:**

Under Rule 215(2), changes to a stationary source are allowed without revision to the existing ROP where a source participates in an emissions trading action between stationary sources pursuant to a federally-approved State Implementation Plan and in which the change does not affect an emission limit or other applicable requirement within the ROP.
 - **Rule 215(3) Notification of Change:**

Under Rule 215(3), a change can be made “off-permit” (without revision to the ROP until permit renewal) at a stationary source if it does not conflict with or is not prohibited by an existing ROP for that source, provided:

 - the change complies with all applicable requirements,
 - the change is not a major New Source Review (NSR) modification, and
 - if the source is an affected source under the Title IV acid rain provisions, the change is not contrary to any applicable requirements of Title IV.
 - **Rule 215(5) Notification of Change:**

Rule 215(5) allows for changes in the address, name or phone number of the responsible official or other contact person identified in the application for the ROP.
 - **Rule 216(1)(a)(i)-(iv) Administrative Amendment:**

Rule 216(1)(a)(i)-(iv) allows for changes to an ROP which includes any of the following:

 - (i) correction of typographical errors,
 - (ii) a minor administrative change at the source,

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- (iii) a change that provides for more frequent monitoring or reporting beyond what is required in a regulation (e.g. NESHAP, NSPS) and/or by any applicable requirement in your ROP, or
- (iv) a change in the ownership or operational control of a source where the Department determines that no other change in the permit is necessary and a written agreement between the parties has been submitted to AQD.

- **Rule 216(1)(a)(v) “Enhanced PTI” Administrative Amendment:**

Rule 216(1)(a)(v) allows for changes to the ROP where:

- a PTI meets the permit content requirements of Rule 213 (including monitoring, recordkeeping & reporting);
- the public participation procedures and review by affected states during PTI review are substantially equivalent to those required by Rule 214;
- the source is in compliance with the terms and conditions of the PTI, and
- no changes are required to the terms and conditions of the PTI.

Any PTIs that underwent a 30-day public comment period that included an ROP public comment period prior to issuance are allowed as administrative amendments under Rule 216(1)(a)(v) if the specified criteria are met.

- **Rule 216(2) Minor Modification:**

Rule 216(2) allows for modifications to the ROP which do not meet the provisions of Rule 215 or Rule 216(1), and do not trigger the requirements of Rule 216(3). For minor PTIs issued after the ROP is issued, the permit must meet Rule 213 content requirements and the other criteria in Rule 216(2) to qualify as a minor modification. Generally, a minor PTI may be incorporated into an ROP as a minor modification. Direct addition of terms or conditions for Maximum Achievable Control Technology Standards or New Source Performance Standards cannot be done as a minor modification. See the “Life After ROP” Workbook for more information.

- **Rule 216(3) Significant Modification:**

Rule 216(3) provides for changes to the ROP that do not qualify for any of the other categories described above. These would include any of the following (unless part of a PTI meeting the Rule 216(1)(a)(v) criteria):

- a major New Source Review (NSR) modification
- a change that would result in emissions that exceed the emissions allowed under the ROP
- a change that would significantly affect an existing monitoring, recordkeeping or reporting requirement in the ROP
- a change that would require or modify a case-by-case determination or
- a change that would establish or modify a synthetic minor limit.

If a proposed change is subject to the PTI program requirements, that change cannot be processed directly as an ROP significant modification without first going obtaining a PTI.

- **Rule 216(4) State-only Modification:**

Rule 216(4) allows for changes to the ROP for modifications made to terms and conditions of an existing ROP that are designated as not enforceable under the Clean Air Act. If the change results in a new applicable requirement that must be enforceable under the Clean Air Act, then the change cannot be a state-only modification.

Note: All Rule 215 notifications and Rule 216 amendment and modification applications must be certified by a Responsible Official.

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- 8. Effective Date** – Enter the date that the change will become effective. This will vary based on the type of submittal. See the detailed instructions that follow for each submittal type and **additional information in the Clean Air Assistance Program’s “Life After ROP” Workbook.**
- **Rule 215(1) Notification of Change**
 - The effective date must be at least 7 days after the notification has been submitted.
 - **Rule 215 (2) Notification of Change**
 - The effective date is the date the emission trade takes place.
 - **Rule 215(3) Notification of Change**
 - The effective date is the date the notification is submitted (contemporaneous).
 - **Rule 215(5) Notification of Change**
 - The effective date is the date the notification is submitted (contemporaneous).
 - **Rule 216(1)(a)(i)-(iv) Administrative Amendment**
 - The effective date is the date the notification is submitted or later.
 - **Rule 216(1)(a)(v) “Enhanced PTI” Administrative Amendment**
 - The effective date is the date the PTI is issued or when the changes covered in the PTI are being implemented.
 - **Rule 216(2) Minor Modification**
 - The effective date must be a date after the AQD has received the application.
 - **Rule 216(3) Significant Modification**
 - A major PTI (with public notice) is issued that does not conflict with any conditions in the ROP – the effective date is the date the PTI is issued or when the changes covered in the PTI are being implemented.
 - A non-major PTI (without public notice) is issued that does not meet any of the previous modification categories – the effective date will be the date the significant modification is approved or later. ***Because the approval date is unknown, leave the effective date blank.***
 - A non-PTI change is made that does not meet any of the previous modification categories – the effective date will be the date the significant modification is approved or later. ***Because the approval date is unknown, leave the effective date blank.***
 - **Rule 216(4) State-Only Modification**
 - The effective date must be a date after the AQD has received the application.
- 9. Change in Emissions** – Indicate whether there will be any change in emissions. This includes any increase or decrease in emissions.
- 10. Description of Change** – Provide a description of any change or addition(s) to the stationary source or to the ROP. At a minimum, the description should include the information specified in the detailed instructions that follow for each category. This information may include:
- Changes in the quantity or quality of emissions and/or pollutants.
 - Changes to an individual emission unit or group of emission units.
 - Addition of a new emission unit or units.
 - Any new applicable requirements that would apply to the source.
 - Any proposed changes to terms and conditions of an existing ROP.
 - Any permit term or condition that will no longer be applicable as a result of the change.

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For Rule 216 changes, attach a mark-up copy of the affected page(s) of the existing ROP indicating the proposed changes. A description of the change may be provided by using a combination of narrative in Item 10 and attaching an AI-001 Form. Be specific about what you are asking to be changed and why. For example, if you are asking to have a condition removed from your ROP explain why this condition should be removed.

For a significant modification request, supplemental ROP application forms and/or a marked-up copy of the existing ROP indicating all proposed changes must be included in the application.

- 11. New Source Review PTI(s) Associated with the Change?** – If an NSR PTI is associated with the change, check Yes. If Yes, enter the PTI number(s). Complete an Additional Information Form (AI-001) to provide any additional PTI numbers, supplemental information about the listed permit(s), and/or to include a marked-up copy of the associated page(s) in the existing ROP.
- 12. Compliance Status** – If any of the following are checked No, submit a narrative compliance plan in accordance with Rule 119(a) and Rule 213(4)(b), including a schedule for compliance on an AI-001 Form.
 - Indicate whether the identified change is in compliance with current applicable requirements.
 - Indicate whether the identified change will continue to be in compliance with current applicable requirements.
 - If the change is the result of a future applicable requirement, indicate whether timely compliance will be achieved by the compliance deadline of that applicable requirement.
- 13. Operator's Additional Information ID** – Create an Additional Information (AI) ID for any associated AI-001 Form that supplements this form. Refer to the AI-001 Form instructions to create the ID. If the additional information or attachment is more than one page, label each page to show the relationship between pages. The AI-001 Form can be accessed via the Internet at <http://www.michigan.gov/air> (Choose the Permits tab, click on "Renewable Operating Permits", then "ROP Compliance Reporting and Changes After Permit Issuance").
- 14. Contact Name, Phone Number and Email Address** – Provide the information for the individual who serves as the contact for this submittal. AQD staff will notify this contact when the application is received and as the application is reviewed and processed.
- 15. Update to ROP Renewal Application** – In addition to the requirement to submit an M-001 Form for changes made after an existing ROP is issued, Rule 210(2)(c) requires updates to an ROP renewal application that has previously been submitted up until release of the draft renewal of the ROP for public participation under Rule 214(3).

To streamline updating a renewal application for the associated Rule 215 and 216 change(s), Item 15 on the M-001 Form may be used to also provide that application update.

Check Yes if this submittal also serves as an update to an existing ROP renewal application and provide the date that the renewal application was submitted. If a Rule 215 or Rule 216 submittal addresses changes to any term or conditions existing within the current ROP, a mark-up of the affected pages must be included. See Rule 210(2)-(3) for further information. If an ROP renewal application has not been submitted or the M-001 Form is not being used to update a renewal application, check the N/A box.

For more information, see the following detailed instructions for each submittal type. Also, if additional space is needed, complete an AI-001 Form.

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Instructions for Rule 215(1): Notification of Change

Under Rule 215(1)(a), changes to a stationary source are allowed without revision to the existing ROP provided:

- the change is not a major modification,
- actual emissions do not exceed the emissions allowed under the ROP, and
- the change does not violate any applicable requirement including any applicable requirement for monitoring, recordkeeping, reporting or compliance certification.

"Emissions allowed" is defined in the rule as including any emission limitation, standard, or condition, including a work practice standard, that is required by an applicable requirement or that establishes an emissions cap which the source has assumed to avoid an applicable requirement.

Under Rule 215(1)(b), changes are allowed for the trading of emissions within a stationary source where allowed by a federally-approved State Implementation Plan (SIP).

EXAMPLES

- If a particular brand of coating is specified in an ROP with an associated emission limit for that coating, the coating brand can be changed provided the emission limit is met.
- Emissions can be traded between emission units at a facility where PTI conditions that allow cross-line averaging have been incorporated into the ROP.

SUBMITTAL REQUIREMENTS

1. **At least seven days in advance of the change**, submit a completed M-001 Form to the appropriate **AQD District Office** and to the U.S. EPA, Air & Radiation Division, Attention: Permits – Michigan, 77 West Jackson Boulevard, Chicago, IL 60604.
2. A description of the change must be provided including:
 - The date of the change.
 - Any change in emissions.
 - Any permit term or condition that would no longer be applicable as a result of the change.

For Rule 215(1)(b) changes, the description must also include:

- The ROP requirements with which the source will comply using the emission trading action.
 - The pollutants emitted subject to the emissions trade.
 - The provisions of the approved SIP with which the source will comply and which provide for the emissions trade within the stationary source.
3. Changes made pursuant to this subdivision cannot violate any applicable requirement including any applicable requirement for monitoring, recordkeeping, reporting, or compliance certification.

FORM COMPLETION

For changes made pursuant to Rule 215(1)(a) and (b), complete Items 1 through 10 and 14. Item 15 is optional.

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Instructions for Rule 215(2): Notification of Change

Rule 215(2) addresses emission trading actions allowed by a federally-approved inter-facility emissions trading program. Under Rule 215(2), such changes are allowed without revision to an ROP where the stationary source participates in an approved emissions trading program and the ROP has wording that allows for such a change.

SUBMITTAL REQUIREMENTS

If considering a change that involves emissions trading between sources, contact the appropriate AQD District Office to discuss the change and how it may affect the ROP.

FORM COMPLETION

If Michigan develops and obtains federal approval of an inter-facility emission trading program, an M-001 submittal might not be required, depending on the provisions of the specific emissions trading program and the wording within the ROP. If an emission trading program is established and approved, further guidance will be made available at that time.

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Instructions for Rule 215(3): Notification of Change

Rule 215(3) allows for changes which do not conflict with or are not prohibited by an existing ROP at a stationary source, without revision to that permit if:

- the change complies with all applicable requirements,
- the change is not a major NSR modification, and
- if the source is an affected source under the Title IV acid rain provisions and the change is not contrary to any applicable requirements of Title IV.

These changes can be made “off-permit” at a stationary source. “Off-permit” means changes that meet the above criteria can be made to an emission unit or units covered by an existing ROP without revision to that permit until the renewal period of the permit. If your change involves a modification to an existing emission unit, the ROP revision category depends on the circumstances. See the instructions for an administrative amendment involving an enhanced PTI (page 2-11), a minor modification (page 2-15), or a significant modification (page 2-18).

EXAMPLES

- The installation of a new emission unit, with a minor PTI, which does not conflict with or is not prohibited by a source-wide requirement in the original ROP.
- The installation of a new emission unit subject to an NSPS, MACT, or other standard where a PTI was not required, and the equipment is not specifically addressed in the original ROP, provided the above criteria is met; for example, cold cleaners exempt from PTI under Rule 281(h).

SUBMITTAL REQUIREMENTS

1. **At the time of the change** submit a completed M-001 Form to the appropriate **AQD District Office** and to the U.S. EPA, Air and Radiation Division, Attention: Permits – Michigan, 77 West Jackson Boulevard, Chicago, IL 60604.
2. A description of the change shall be provided including:
 - The date of the change.
 - Any change in emissions.
 - Any pollutants emitted.
 - Any applicable requirement that would apply as a result of the change.

The description of change may be provided through a combination of completing Item 10 and attaching a PTI or an AI-001 Form.

3. A record must be kept describing changes made at the stationary source that result in emissions of an air contaminant which are subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the changes.
4. If necessary, an AI-001 Form should be used to submit supplemental information.

FORM COMPLETION

For changes made pursuant to Rule 215(3), complete Items 1 through 11 and 14. Item 15 is optional.

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Instructions for Rule 215(4): Insignificant Changes

Rule 215(4) allows for "off-permit" changes at a stationary source covered by an ROP, without revision to that permit, for insignificant activities pursuant to Rule 212(2) or that involve the installation, construction, reconstruction, relocation, alteration, or modification of any exempt process or process equipment listed pursuant to Rule 212(3) and (4), provided that:

- the change does not result in a violation of any applicable requirement,
- the change would not exceed a synthetic minor limit in the ROP, and
- the change would not require or modify any existing emission limitation or standards, source-specific ambient air impacts, or visibility/increment analyses.

This includes the installation of any emission unit that is exempt from the requirement to obtain a Permit to Install under Rules 280 through 290, provided the change is not excluded by Rule 278 and the criteria above are met.

A source must meet always comply with the "exclusion from exemption" requirements of Rule 278 (e.g. a source may not add activities sufficient to result in an increase of actual emissions greater than the significance levels defined in Rule 119, thereby triggering NSR requirements).

Note: *In accordance with Rule 212(2)(b) and (c), activities and changes considered exempt under PTI Rule 285(a) to (f) and Rule 287 (f) to (h) cannot be made under Rule 215(4) if any compliance monitoring requirements in the ROP would be affected. If compliance monitoring requirements are affected, the ROP would have to be revised through a modification*

EXAMPLES

- The installation of a welding operation.
- Routine maintenance to an emission unit.
- The installation of a paint booth where coating usage is less than 200 gallons per month.
- The installation of a cold cleaner exempt under Rule 281(h) and not subject to Halogenated MACT standard.

SUBMITTAL REQUIREMENTS

None

FORM COMPLETION

For changes made pursuant to Rule 215(4), an M-001 Form does not need to be completed.

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Instructions for Rule 215(5): Notification of Change

Rule 215(5) allows for changes in the address, name or phone number of the responsible official or other contact person identified in the application for the ROP

SUBMITTAL REQUIREMENTS

1. **At the time of the change** submit a completed M-001 Form to the appropriate **AQD District Office** and to the U.S. EPA, Air and Radiation Division, Attention: Permits – Michigan, 77 West Jackson Boulevard, Chicago, IL 60604.
2. A description of the change shall be provided including:
 - The date of the change.
 - What position the change affects: the responsible official, a contact person for the company, etc.
 - What specific information is being changed: the address, name and/or phone number of the position

The description of change may be provided through a combination of completing Item 10 and attaching a PTI or an AI-001 Form.

3. If necessary, an AI-001 Form should be used to submit supplemental information.

FORM COMPLETION

For changes made pursuant to Rule 215(3), complete Items 1 through 10 and 14. Item 15 is optional.

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Instructions for Rule 216(1)(a)(i)-(iv): Administrative Amendment

Rule 216(1)(a)(i)-(iv) is for changes to an ROP which include any of the following:

- correction to typographical errors,
- a minor administrative change at the source,
- a change that provides for more frequent monitoring or reporting, or
- a change in the ownership or operational control of a source where the department determines that no other change in the permit is necessary and a written agreement between the parties has been submitted to the AQD.

EXAMPLES

- Misspelled words.
- Omitted words that would not alter the intent or language of the condition.
- A change in ownership and an associated change in the company name.

SUBMITTAL REQUIREMENTS

1. The administrative amendment request must be submitted using an M-001 to ***MDEQ Air Quality Division, Cadillac District Office, 120 West Chapin St, Cadillac, MI 49601.***
2. A brief description of the change shall be provided.
3. If ownership or operational control has changed, the AQD must also be notified of any change in the responsible official or contact regarding the ROP under Rule 215(5).
4. Submit a C-001: Certification Form which certifies that the statements and information in the request are true, accurate, and complete.
5. If necessary, an AI-001 Form should be used to submit supplemental information.

FORM COMPLETION

For administrative amendments made pursuant to Rule 216(1)(a)(i)-(iv), complete Items 1 through 10 and 14. Item 15 is optional.

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Instructions for Rule 216(1)(a)(v): Administrative Amendment

Rule 216(1)(a)(v) is for changes to an ROP involving a new permit to install (PTI) where

- the PTI meets the permit content requirements of Rule 213 (including monitoring, recordkeeping & reporting),
- the public participation procedures and review by affected states during PTI review were substantially equivalent to those required by Rule 214,
- the source is in compliance with the terms and conditions of the PTI, and
- no changes are required to the terms and conditions of the PTI.

Amendments under Rule 216(1)(a)(v) include major NSR PTIs and MACT determinations made under Section 112(g) that meet the specified criteria.

The appropriate AQD District Office must be notified within 30 days after the completion of the installation, construction, reconstruction, relocation, alteration, or modification of the process covered by the PTI. The application for the administrative amendment must be submitted to the AQD Cadillac District Office within 12 months of commencing operation and must include the results of the testing, monitoring and recordkeeping required by the PTI.

EXAMPLES

- The installation of new equipment or modification of existing equipment contained under a major PSD permit that went through a public comment process equivalent to that under Title V and which contains all necessary monitoring, recordkeeping and reporting.
- The installation of new equipment or modification of existing equipment contained under a minor PTI that went through a public comment process equivalent to that under Title V and which contains all necessary monitoring, recordkeeping and reporting.

SUBMITTAL REQUIREMENTS

1. The administrative amendment request must be submitted using an M-001 to ***MDEQ Air Quality Division, Cadillac District Office, 120 West Chapin St, Cadillac, MI 49601.***
2. The submittal must contain:
 - Results of all testing, monitoring, and recordkeeping performed to determine compliance.
 - A schedule of compliance for the process or process equipment.

An AI-001 Form should be used to submit the supplemental information.

3. Submit a C-001: Certification Form which certifies that the statements and information in the request are true, accurate, and complete.

FORM COMPLETION

For administrative amendments made pursuant to Rule 216(1)(a)(v), complete Items 1 through 14. Item 15 is optional.

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Instructions for Rule 216(2): Minor Modification

Rule 216(2) is for modifications that do not meet the provisions of Rule 215 or Rule 216(1), and are not required to be processed under Rule 216(3). A modification under Rule 216(2) is for changes to a ROP which would not

- violate any applicable requirement,
- significantly affect any existing monitoring, recordkeeping, or reporting requirements,
- require or modify a case-by-case determination,
- establish or modify a synthetic minor limit, or
- require a major NSR Permit to Install (PTI).

In general, changes which qualify as minor modifications do not require significant judgment to determine the revised ROP terms and conditions. Minor modifications may involve adding or revising applicable requirements that do not require additional technical review or case-specific determinations in order to determine the revised ROP conditions.

Typically, a minor PTI may be incorporated into an ROP as a minor modification because addressing the minor PTI conditions should not involve the above type of changes. For example, a minor PTI cannot legally authorize a violation of any underlying applicable requirement. Monitoring, recordkeeping, and reporting requirements in a minor PTI have already undergone review and approval through the minor PTI program. Also, the incorporation of minor PTI requirements into the ROP does not require or modify case-by-case determinations or establish or modify synthetic minor limits because those requirements have already been established through the minor PTI program. Finally, a minor PTI cannot be issued to address PSD or nonattainment NSR requirements.

In other words, any case-by-case technical review and applicable requirement determinations are established pursuant to the PTI program, not the ROP program. Because the technical judgments are made during the PTI review, the subsequent ROP revision application simply requests that the conditions of that PTI be incorporated into the ROP.

However, if an ROP revision requires changes beyond directly incorporating the conditions of a new minor PTI, such changes would also have to meet the criteria above in order to be eligible for the minor modification process. For example, in the unlikely event that a PTI was inadvertently issued with no monitoring or recordkeeping requirement to verify compliance with a particular emission limit, the corresponding ROP revision must be processed as a significant modification to include appropriate further condition(s) for determining compliance with that emission limit.

Note that “major PTIs” undergo a public and affected state(s) review process that is comparable to the full review process for ROPs; therefore, major PTIs should qualify to be incorporated as “enhanced PTI” administrative amendments pursuant to Rule 216(1)(a)(v). If not, these changes would be processed as significant modifications.

EXAMPLES

- The installation of an emission unit(s) or modification of an existing emission unit(s) contained under a minor PTI that did not go through a public comment process, but contains all necessary monitoring recordkeeping and reporting.
- Amending existing ROP requirements to implement a Maximum Achievable Control Technology (MACT) standard to add further conditions that do not require significant evaluation.

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SUBMITTAL REQUIREMENTS

1. The minor modification request must be submitted using an M-001 to ***MDEQ Air Quality Division, Cadillac District Office, 120 West Chapin St, Cadillac, MI 49601.***
2. A description of the change must be provided including the quality and quantity of emissions resulting from the change, and any new applicable requirement that would apply as a result of the change.
3. Proposed changes to the terms and conditions of the ROP must be provided which are adequate to address the change and any new applicable requirements.
4. A C-001: Certification Form must be submitted which certifies that the proposed modification meets the criteria for a minor permit modification and that the statements and information in the request are true, accurate, and complete.
5. If necessary, an AI-001 Form should be used to submit supplemental information.

FORM COMPLETION

For minor modifications made pursuant to Rule 216(2), complete Items 1 through 12 and 14. Item 15 is optional.

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Instructions for Rule 216(3): Significant Modification

Rule 216(3) is for significant modifications. These are changes that do not qualify for any of the previous categories or as state-only modifications and that involve any of the following (unless part of a PTI meeting Rule 216(1)(a)(v)):

- a major modification under Title I (a change that triggers PSD or LAER);
- a change that would result in emissions that exceed the emissions allowed under the ROP;
- a change that would significantly affect an existing monitoring, recordkeeping or reporting requirement in the ROP;
- a change that would require or modify a case-by-case determination; or
- a change that would establish or modify a synthetic minor limit.

EXAMPLES

- The installation of new equipment or modification of existing equipment contained under a major NSR PTI that went through a public participation process equivalent to that required by Rule 214 but does not contain all necessary monitoring, recordkeeping and reporting. (See the instructions for “enhanced NSR” administrative amendments to address other major PTIs.)
- Incorporating a new minor PTI that does not contain all necessary monitoring, recordkeeping and reporting for the modification of existing equipment. (See the instructions for minor modifications to address other revisions involving minor PTIs.)
- The source requests to change to a different monitoring method from requirements established in the ROP pursuant to Rule 213(3).

SUBMITTAL REQUIREMENTS

1. The significant modification request must be submitted using an M-001 to ***MDEQ Air Quality Division, Cadillac District Office, 120 West Chapin St, Cadillac, MI 49601.***
2. The application requirements (including submittal of the method for determining compliance) are equivalent to those for an initial application, except that the application addresses only the emission units affected by the change. ROP application forms must be submitted in addition to an M-001 Form.
3. A C-001: Certification Form must be submitted which certifies that the statements and information in the request are true, accurate, and complete.

FORM COMPLETION

For significant modifications made pursuant to Rule 216(3), complete Items 1 through 7, 9 through 12, and 14. Item 15 is optional.

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Instructions for Rule 216(4): State-Only Modification

Rule 216(4) is for state-only modifications where changes made to terms and conditions of an existing ROP that are designated as not enforceable under the Clean Air Act. If the change results in any new applicable requirement that must be enforceable under the Clean Air Act, then the change cannot be a state-only modification.

EXAMPLES

- Only conditions identified with Footnote 1 or an asterisk in an existing ROP can be changed as a state-only modification.

SUBMITTAL REQUIREMENTS

1. The state-only modification request must be submitted using an M-001 to ***MDEQ Air Quality Division, Cadillac District Office, 120 West Chapin St, Cadillac, MI 49601.***
2. A description of the change must be provided, including the quality and quantity of emissions resulting from the change, and any new applicable requirement that would apply as a result of the change.
3. Proposed changes to the terms and conditions of the ROP must be provided that are adequate to address the change and any new applicable requirements.
4. A C-001: Certification Form must be submitted which certifies that the proposed modification meets the criteria for a minor permit modification and that the statements and information in the request are true, accurate, and complete.
5. If necessary, an AI-001 Form should be used to submit supplemental information.

FORM COMPLETION

For state-only modifications made pursuant to Rule 216(4), complete Items 1 through 12 and 14. Item 15 is optional.