

CHAPTER 8

The Applicable Requirement Forms

AR-001

AR-002

Revised March 2008

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INTRODUCTION TO THE APPLICABLE REQUIREMENT FORMS

What is an Applicable Requirement?

For the purpose of these forms and instructions "applicable requirements" include all specific terms or conditions from a Renewable Operating Permit (ROP), Permit to Install (PTI), or Consent Order (CO) or Consent Judgment (CJ). Other examples include requirements of state or federal rules, regulations or statutes (e.g., Chrome NESHAP, Industrial Boiler NSPS, Rule 213(3) for periodic monitoring, and Rule 331 for particulate emissions). The ROP Program requires that all existing and proposed applicable requirements, including those that apply source-wide, be identified in the ROP application. The Applicable Requirement (AR) forms are designed to identify all existing applicable requirements and obtain the information necessary to process the application. The AR forms may also be used to propose new applicable requirements or delete, consolidate, or clarify existing applicable requirements. These forms may also be used to propose alternative operating scenarios pursuant to Rule 213(8) or specific intra-facility emission trading actions pursuant to Rule 213(9).

General Conditions in a PTI or General Requirements in an ROP do not have to be included in the ROP application unless the facility is in violation of the specific condition or requirement. Also, any applicable requirements under the federal program regulating ozone-depleting substances (40 CFR Part 82) or the federal accidental release program (40 CFR Part 68) do not have to be included in the ROP application unless the facility is in violation of the specific condition or requirement.

Limits and Restrictions

The Limits and Restrictions Form (AR-001) is used to identify emission limits, material limits, visible emission limits, stack and vent restrictions, design and equipment restrictions, operational restrictions, and other requirements. These requirements will usually appear in your existing ROP under the heading "Emission Limits," "Material Limits," "Process/Operational Restrictions," "Design/Equipment Parameters," "Stack/Vent Restriction," and sometimes under "Other Requirements."

Monitoring, Testing, Recordkeeping, and Reporting

The Monitoring, Testing, Recordkeeping, and Reporting Requirements Form (AR-002) is used to identify monitoring/recordkeeping requirements, testing/sampling requirements, records maintenance requirements, and reporting requirements. These requirements will appear in your existing ROP under the heading "Testing/Sample," "Monitoring/Recordkeeping," "Reporting," and sometimes under "Other Requirements."

The ROP Program requires a method to determine compliance with each and every emission limit, material limit, visible emission limit, and operational restriction. This is accomplished through monitoring, testing, recordkeeping and/or reporting requirements, which may already exist in a PTI or an ROP. If a limit or restriction that is identified on an AR-001 form does not have an associated monitoring, testing, recordkeeping and/or reporting requirement, then compliance demonstration requirements must be proposed by the applicant. See the AR-002 form completion instructions (page 8-16) for detailed instructions on proposing such an applicable requirement. When a compliance demonstration method is proposed, the applicant must also complete the Proposed Monitoring/Recordkeeping Form (MS-001), the Proposed Testing/Sampling Form (MS-002), and/or the Proposed Reporting Form (MS-003).

Source-wide Requirements

Source-wide requirements must be included in the ROP application. Source-wide requirements are any applicable requirements that apply to the entire stationary source. An example of a source-wide requirement would be a synthetic minor Hazardous Air Pollutant (HAP) emission limit and associated recordkeeping that applies to the entire stationary source. Source-wide applicable requirements do not require the creation of an emission unit or flexible group. However, each source-wide requirement must be identified on the appropriate AR-001 or AR-002 forms. Your SRN will appear at the top of these forms in place of an emission unit or flexible group ID (see page B-2).

Obsolete Requirements

The AR-001 or AR-002 forms may be used to propose deletion of an obsolete applicable requirement. Justification for each request must also be included on the AR-001 or AR-002 forms. If additional space is needed for a complete explanation of the request, complete and attach an AI-001. If multiple applicable requirements are involved in the request, each associated AR-001 or AR-002 must reference the same AI-001.

Alternative Operating Scenario Proposals

Pursuant to Rule 213(8), the ROP application may be used to propose terms and conditions for an alternative operating scenario in the ROP. Justification for each request must also be included on the AR-001 or AR-002 forms (see Step 10 of the form completion instructions). If additional space is needed for a complete explanation of the request, complete and attach an AI-001 form. If multiple applicable requirements are involved in the request, each associated AR-001 must reference the same AI-001.

Intra-Facility Emission Trading Proposals

Pursuant to Rule 213(9), the ROP application may also be used to propose terms and conditions for the trading of emissions increases and decreases among process and process equipment within the stationary source. This ability is provided solely for the purposes of complying with an emissions cap that is established in the ROP, independent of other applicable requirements. Justification for each request must also be included on the AR-001 or AR-002 forms. If additional space is needed for a complete explanation of the request, complete and attach an AI-001 form. If multiple applicable requirements are involved in the request, each associated AR-001 must reference the same AI-001.

Prompt Deviation Reporting, Semi-Annual Deviation Reporting, and Annual Compliance Certification Applicable Requirements

The three applicable requirements that pertain to prompt reporting of deviations, semi-annual reporting of deviations, and annual compliance certifications do **NOT** have to be included in your ROP application (Figure 8-1). These three requirements appear in every ROP and refer to General Requirements; therefore, it is unnecessary to include them in the application.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. Report shall be received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. Report shall be received by appropriate AQD district office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

Figure 8-1

THE LIMITS AND RESTRICTIONS FORM (AR-001)

AR-001 LIMITS AND RESTRICTIONS

Form Type AR-001 SRN Z9999 Operator's EU/FG/Source ID EUBOILER Record 1 of 5

APPLICABLE REQUIREMENT INFORMATION

AOD Applicable Requirement ID AR100004 Operator's Applicable Requirement ID Form 1 of 1

Applicable Requirement Type

Is This Applicable Requirement Enforceable in a Consent Order (CO) or Consent Judgment (CJ)?

CO/CJ number and paragraph number

Origin

Permit Number Action

Underlying Applicable Requirement Citation

UAR

Applicable Requirement Status Verification

Status Justification

Proposed Applicable Requirement Text

Is this a Future Applicable Requirement? Enter applicability date 00/00/0000

Compliance Status

Is this emission unit or flexible group in compliance with this applicable requirement?

Will this emission unit or flexible group continue to be in compliance with this applicable requirement?

If this applicable requirement is a future applicable requirement, will timely compliance be achieved?

Operator's Additional Information ID Display Additional Information Form Clear Additional Information ID

Ready

FORM OVERVIEW

The Limits and Restrictions Form, AR-001, is used to identify existing and proposed applicable requirements that are limits or restrictions. These include:

- limits on emissions, materials, or visible emissions
- restrictions on operations, design or equipment, or a stack or vent
- other requirements which may be a limit or restriction

It is expected that most existing applicable requirements will remain as they were written in the original document from which they were created. However, certain situations may exist in which an applicable requirement may need to be changed. For example, an existing operational restriction may need to be changed in order to comply with other applicable requirements in an ROP, or the specific wording of an applicable requirement may need to be changed. Additionally, certain applicable requirements may no longer be applicable and may need to be deleted. There will also be some instances in which new applicable requirements will need to be added to an ROP (e.g., creating a synthetic minor limit). The AR-001 form is designed to capture the information necessary for changing, proposing, or deleting an applicable requirement or keeping the requirement as is.

Any requirement listed as a General Condition in a Permit to Install or as a General Requirement in an ROP should not be identified on the AR-001 form unless the facility is in violation of that specific condition or requirement.

In general, similar applicable requirement types may be reported on a single AR-001 form as long as no changes to any of the requirements are being proposed. For example, if there are seven emission limits identified for EU-WIDGET, and you wish to keep each of the requirements as they are, you only need to complete one AR-001 form to identify all the emission limits (see the diagram below). If you are going to propose a new applicable requirement or change or delete an existing requirement, you will need to identify that applicable requirement on its own AR-001 form.

Detailed instructions for completing each of the AR forms are provided in subsequent pages.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	260 pounds per hour ²	Determined on a daily average	EU-BOILER1-S1	S.C. V.1	R 336.1331
2. Particulate Matter	0.20 pounds ²	Per 1000 pounds of exhaust gases	EU-BOILER1-S1	S.C. V.1	R 336.1331
3. Sulfur Dioxide	1,900 pounds per hour ²	50% excess air Determined on a daily average	EU-BOILER1-S1	S.C. VI.1	R 336.1401
4. Nitrogen Oxide	1,000 pounds per hour ²	Determined on a daily average	EU-BOILER1-S1	S.C. VI.1	R 336.1205(3)

All these requirements can be grouped onto the same AR-001 form as long as no changes are being proposed..

FORM RELATIONSHIP



Each emission unit or flexible group that was identified on an EU-003 or FG-001 form will be linked to one or more AR-001 form(s). The top of the AR-001 form will display the Operator’s Emission Unit/Flexible Group ID to which the AR-001 form is linked. An AR-002 form will be linked to any applicable requirement identified on the AR-001 that has a **material limit, emission limit, visible emission limit, or operational restriction** identified as the “Applicable Requirement Type.”

FORM COMPLETION INSTRUCTIONS

A blank AR-001 form will be created for each emission unit that was identified on the EU-003 form or flexible group identified on the FG-001 form. The Operator's EU/FG/Source ID field at the top of the form identifies which emission unit or flexible group this form is associated with. If there is more than one applicable requirement associated with the emission unit/flexible group you will have to create additional AR-001 forms as necessary (see "Adding an Applicable Requirement Form" on page 8-13).

An AR-001 form is automatically created with the source's State Registration Number (SRN) as the ID. Use this form to enter any source-wide applicable requirements, which are identified in Part B of your existing ROP. If your source does not have source-wide requirements leave this form blank.

The top of the form displays the **Form Type** that is open (AR-001) as well as the facility's SRN. Make sure that your SRN appears in the SRN window. Also displayed at the top of the form is the Operator's EU/FG/Source ID to which this AR-001 form is associated. This ID is the Operator's ID that was entered on the EU-003 or FG-001 form. These fields are pre-filled and cannot be edited (Figure 8-3).

The screenshot shows the AR-001 form interface. At the top, there is a header bar with the title 'AR-001 LIMITS AND RESTRICTIONS'. Below this, there are several fields: 'Form Type' set to 'AR-001', 'SRN' set to 'Z9999', and 'Operator's EU/FG/Source ID' set to 'EUBOILER'. To the right of these fields, it says 'Record 1 of 5'. Below this is a section titled 'APPLICABLE REQUIREMENT INFORMATION'. It contains two fields: 'AQD Applicable Requirement ID' set to 'AR100004' and 'Operator's Applicable Requirement ID'. To the right of these fields, it says 'Form 1 of 1'. There are two callout boxes: one pointing to the top right corner with the text 'Refers to EU/FG record displayed.' and another pointing to the bottom right corner with the text 'Refers to the AR-001 form displayed.'

Figure 8-3: Record Counters

A record counter, which identifies the record currently displayed, appears in the upper-right corner (Figure 8-3). On this form, "Record 1 of 5" indicates that emission unit or flexible group Record 1 of 5 is currently displayed on the screen. The number in the counter should correspond to the number of emission units identified on EU-003 forms, flexible groups identified on FG-001 forms, and any source-wide applicable requirements. To move to a different EU/FG, click anywhere in the top section of the form and use the arrow buttons on the tool bar.

Another counter will keep track of the Applicable Requirement Form displayed. This is the number of AR-001 forms associated with the emission unit or flexible group identified at the top of the screen (Figure 8-3). "Form 1 of 1" indicates that there is only one AR-001 associated with the emission unit/flexible group identified at the top of the screen. This counter will be adjusted if an Applicable Requirement Form is added (e.g. Form 2 of 2). To move to a different AR-001 Form, use the arrow buttons on the tool bar or click on the browse button (the cursor must be in the applicable requirement information section of the form to do this).

Applicable Requirement Information

APPLICABLE REQUIREMENT INFORMATION		Form 1 of 1
1	AQD Applicable Requirement ID AR100004	2 Operator's Applicable Requirement ID
	Applicable Requirement Type	3
	Is This Applicable Requirement Enforceable in a Consent Order (CO) or Consent Judgment (CJ)?	4
	CO/CJ number and paragraph number	
5	Origin	6
	Permit Number	7
	Action	8
9	Underlying Applicable Requirement Citation UAR	

- AQD Applicable Requirement ID:** This is a unique ID assigned to the applicable requirement by the software. This number is automatically assigned and cannot be edited.
- Operator's Applicable Requirement ID:** Enter a unique ID for the applicable requirement(s). The Operator's Applicable Requirement ID should begin with an "AR1" prefix plus any combination of up to 14 letters, numbers, or keyboard characters. Spaces are not allowed within the operator's ID. It is recommended that you first determine the Applicable Requirement Type in Step 3 then use the code shown in Table 8-1 to create your ID.

For example, the Operator's Applicable Requirement ID for all the emission limits under an emission unit could be "AR1-EL." If you wish to identify a specific applicable requirement on the form because it is new (being proposed) or you are requesting that it be changed or deleted, then the ID should be more specific such as AR1-EL-003, where the "003" indicates the third emission limit under the emission unit or flexible group.

If you choose another numbering system, be sure that you are consistent throughout the application.

Table 8-1: Applicable Requirement Codes for the AR-001 Form

Applicable Requirement Types	Operators Applicable Requirement ID	AR-002 Form Required?
Material Limits	AR1-ML	Yes
Emission Limits	AR1-EL	Yes
Visible Emissions Limits	VEL	Yes
Operational Restriction	AR1-OR	Yes
Design / Equipment Restriction	AR1-DE	No
Stack / Vent Restriction	AR1-SV	No
Other Requirements	AR1-OTHER	No

3. **Applicable Requirement Type:** Click on this field and a drop-down list of requirement types will appear. These options correspond to the requirement types identified in your existing permit. Using your existing permit as a guide, select the most appropriate requirement type for the applicable requirement(s) you will be entering on this form.

The Applicable Requirement Type you choose will determine whether an AR-002 form must be completed to identify the associated compliance method(s) (e.g., monitoring/recordkeeping, testing/sampling, reporting, etc). Table 8-1 identifies which types of applicable requirements require a method for demonstrating compliance by requiring the completion of an AR-002 form.

4. **Is This Applicable Requirement Enforceable in a Consent Order (CO) or Consent Judgment (CJ)?:** Select “Yes” if the applicable requirement is enforceable under a CO or CJ. Select “No” if this applicable requirement is not enforceable under a CO or CJ.

If “Yes” is selected in this field enter the CO/CJ number and paragraph number in the next field provided. The CO/CJ number and paragraph number field will not be available if “No” is selected.

5. **Origin:** Using the guidelines below, select the most appropriate origin from the drop-down list (“ROP,” “Permit to Install,” or “Propose”).

For the purpose of an application for initial ROPs, applicable requirements will typically “originate” in a Permit to Install (PTI). Once an applicable requirement from a PTI has been incorporated into an ROP, the “origin” of the applicable requirement is considered to be the ROP for all future permit applications. If a PTI exists that has not been incorporated into an ROP, the applicable requirements from the PTI must be included in an ROP application for an amendment, modification, or renewal. For the purpose of the ROP applications the “origin” of these applicable requirements is considered the PTI. For any proposed applicable requirements (e.g., a stricter emission limit in an upcoming federal regulation which you will be subject to), the “origin” is the underlying state rule(s) or federal regulation(s) on which the proposed applicable requirement is based. There may be applicable requirements that initially originate in a CO or CJ.

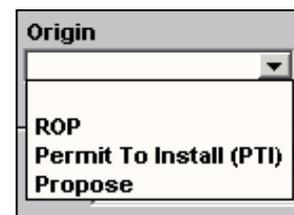


Figure 8-4: Origin of the AR

- The “origin” for all terms and conditions in an existing ROP is the ROP regardless of where the applicable requirement initially originated. If the applicable requirement is in your existing ROP, select “**ROP**” and proceed to Step 6.
- The “origin” for all terms and conditions of a PTI that have not yet been incorporated into an ROP is the PTI. If this applicable requirement is in a PTI that has not yet been incorporated into your ROP, select “**Permit to Install**” and proceed to Step 6.
- If the stationary source has recently become subject to an existing or newly promulgated state rule, federal regulation, or federal statute; and the limits and restrictions have not yet been incorporated into the ROP or a PTI (e.g., a new MACT standard with new or more stringent emission limits), select “**Propose**” and complete Steps 9 through 15. Proceed to Step 9.
- If you are proposing a voluntary, more stringent limit or restriction select “**Propose**” and complete Steps 9 through 15. Proceed to step 9.
- **Note:** *If an applicable requirement initially originated in a CO or CJ and has not yet been incorporated into an ROP, the CO or CJ must only be identified in Step 4. You do not have to complete Steps 5 through 8.*

If the applicable requirement initially originated in a CO or CJ and it has already been incorporated into an ROP or PTI, the CO/CJ must be identified in Step 4. The origin and the associated requirement or special condition number must be entered in Steps 5 and 6.

6. **Permit Number:** Enter the PTI or ROP number. If “ROP” or “Permit to Install” was selected in Step 5, enter the associated ROP or PTI number in this field (e.g., MI-ROP-Z9999-2005 or 987-02). Proceed to Step 7.

7. **Requirement/Special Condition No.:** If “ROP” was selected in Step 5, enter the requirement number(s) from the ROP. Use the numbering structure that is in the ROP. Remember, you may group applicable requirements that fall under the same requirement type as long as you are not proposing to make any changes to any of the requirements. For example, the conditions that appear in Figure 8-5 below may be identified as “1.1-4,” where “1” denotes that the requirements are “Emission Limits” and “1-4” are the four requirements that are emission limits. If you are proposing to change or delete a specific requirement, you will need to identify the specific requirement on its own AR-001 form and enter the specific requirement number in this field such as “1.2”.

If “Permit to Install” was selected in Step 5, use a similar naming format to identify a single requirement (e.g. SC 1.2) or group of requirements (SC 3.1-3.4) from the existing PTI. Proceed to Step 8.

I. <u>EMISSION LIMIT(S)</u>					
Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	260 pounds per hour ²	Determined on a daily average	EU-BOILER1-S1	S.C. V.1	R 336.1331
2. Particulate Matter	0.20 pounds ²	Per 1000 pounds of exhaust gases, corrected to 50% excess air	EU-BOILER1-S1	S.C. V.1	R 336.1331
3. Sulfur Dioxide	1,900 pounds per hour ²	Determined on a daily average	EU-BOILER1-S1	S.C. VI.1	R 336.1401
4. Nitrogen Oxide	1,000 pounds per hour ²	Determined on a daily average	EU-BOILER1-S1	S.C. VI.1	R 336.1205(3)

Figure 8-5: Applicable Requirements in ROP

8. **Action:** Choose the action that is to be taken on the applicable requirement(s).

- Select “**Keep**” if the existing applicable requirement(s) identified in step 7 is acceptable and no changes are necessary.
- Select “**Change**” if the existing applicable requirement identified in step 7 needs to be modified or altered to ensure continued compliance. “Change” should be used only for very minor changes to a requirement which do not affect the meaning or intent of the requirement. A justification must be provided in Step 10.
- Select “**Delete**” if the existing applicable requirement identified in step 7 is obsolete. A justification must be provided in Step 10.

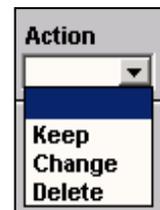


Figure 8-6: AR Action

9. Underlying Applicable Requirement Citation: The underlying applicable requirements (UAR) are the state rules or federal regulations on which the applicable requirement is based. UARs are listed after each of the applicable requirements in your existing permit (Figure 8-7).

If you want to keep the UARs for the requirement as they appear in your existing permit, enter **“Keep UAR”** in this field.

If you wish to make a change to a UAR in the existing permit, you should enter the appropriate UAR in this field. All UARs should be entered using the following formats:

- State Rules: R 336.1201(1)(a)(iv)
- Federal Regulations: 40 CFR 60.1(a)(1)(iv)(B)
- Michigan Compiled Law (the Michigan NREP Act): MCL 324.5504(1)(a)(iv)

If the applicable requirement has more than one UAR you will need to add a UAR field. To add additional fields, go to the **Edit** menu and select **Add UAR**. To delete a UAR that was entered, select the UAR to be deleted, go to the **Edit** menu and select **Delete UAR**.

I. EMISSION LIMIT(S)					
Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	260 pounds per hour ²	Determined on a daily average	EU-BOILER1-S1	S.C. V.1	R 336.1331
2. Particulate Matter	0.20 pounds ²	Per 1000 pounds of exhaust gases, corrected to 50% excess air	EU-BOILER1-S1	S.C. V.1	R 336.1331
3. Sulfur Dioxide	1,900 pounds per hour ²	Determined on a daily average	EU-BOILER1-S1	S.C. VI.1	R 336.1401
4. Nitrogen Oxide	1,000 pounds per hour ²	Determined on a daily average	EU-BOILER1-S1	S.C. VI.1	R 336.1205(3)

UAR

Figure 8-7: UAR Citations in ROP

Applicable Requirement Status Verification

Applicable Requirement Status Verification

10 Status Justification

11 Proposed Applicable Requirement Text

Is this a Future Applicable Requirement? 12 Enter applicability date 00/00/0000 13

Compliance Status

Is this emission unit or flexible group in compliance with this applicable requirement? 13

Will this emission unit or flexible group continue to be in compliance with this applicable requirement? 14

If this applicable requirement is a future applicable requirement, will timely compliance be achieved? 14

16 Operator's Additional Information ID Display Additional Information Form Clear Additional Information ID 15

10. Status Justification: If the applicable requirement is being proposed, changed, or deleted enter the justification.

- 11. Proposed Applicable Requirement Text:** If changing or proposing an applicable requirement, provide the proposed applicable requirement text (text may be taken directly from the rule or regulation).
- 12. Is this a Future Applicable Requirement?:** Select “Yes” if the underlying applicable requirement identified in Step 9 has been or will be promulgated prior to issuance of the ROP and has future compliance deadlines. Select “No” if the applicability date for the identified underlying applicable requirement has been or will be reached prior to issuance of the ROP.

If “Yes” is selected, enter the date of future applicability in the following field.

Compliance Status

If you grouped several requirements of the same type together in step 7, answer questions 13 - 15 as it applies to ALL the requirements identified in step 7. If the emission unit/flexible group is not in compliance with a requirement identified in step 7 then you should select “No.”

If “No” is selected for any of the following, submit a narrative compliance plan including a schedule for compliance on an AI-001 (see Rules 103(ee) and 119(a) in Appendix C for the definition of “compliance plan” and schedule of compliance”). The Compliance Status fields are not required for proposed limits and restrictions.

- 13. Is this emission unit or flexible group in compliance with this applicable requirement?:**
- Select “Yes” if the emission unit or flexible group is currently in compliance with the identified applicable requirement(s) identified in step 7.
 - Select “No” if the emission unit or flexible group is currently NOT in compliance with the applicable requirement(s) identified in step 7. Submit a narrative compliance plan including a schedule for compliance using an AI-001 form (see Step 16).
 - Leave this field blank if the applicable requirement has future applicability and proceed to Step 15.
- 14. Will this emission unit or flexible group continue to be in compliance with this applicable requirement?:** Only complete if “Yes” was selected in Step 13.
- Select “Yes” if the emission unit or flexible group will continue to comply with the applicable requirement(s) identified in step 7.
 - Select “No” if the emission unit or flexible group will not continue to comply with the applicable requirement(s) identified in step 7. Submit a narrative compliance plan including a schedule for compliance using an AI-001 form (see Step 16).
 - Leave this field blank if the applicable requirement has future applicability or you answered “No” to step 13.
- 15. If this applicable requirement is a future applicable requirement, will timely compliance be achieved?:** Only complete if the applicable requirement has future applicability.
- Select “Yes” if your source intends to comply with the provisions of the future applicable requirement prior to the compliance deadline.

- Select “No” if your source will be in violation of the future applicable requirement at the time of the compliance deadline. Submit a narrative compliance plan including a schedule for compliance using an AI-001 form (see Step 16).
- Leave this field blank if the applicable requirement is not a future applicable requirement.

16. Operator’s Additional Information ID: An Additional Information Form (AI-001) may be used to supplement any of the information required on this form. Click on the “Display Additional Information Form” button to associate this form with an AI-001 form. When you click on this button either a blank AI-001 form will be generated for you to complete or a display window that contains AI-001 forms that have been created and not linked to another form will appear. If the display window appears select one of the AI-001 forms that have already been created and click “OK” or choose “New” to generate a blank AI-001 form. Refer to Chapter 11 for instructions on how to complete the AI-001 form and create an Operator’s Additional Information ID.

If an Operator’s Additional Information ID appears in this field and you would like to view the AI-001 form associated with it, click on the “Display Addition Information Form” button. If you would like to break the link to this form, click on the “Clear Additional Information ID” button. Although the ID will be cleared, the AI-001 form will still exist and can be linked to another form or deleted. Refer to Chapter 11 for guidance on deleting an AI-001 form.

ADDING AN APPLICABLE REQUIREMENT FORM

Usually an emission unit or flexible group will have more than one applicable requirement associated with it. Use the following procedure to add an AR-001 form:

1. Choose **Edit** on the menu bar and select **Add Applicable Requirement Form**.
2. A new AR-001 form will be generated to complete for the emission unit or flexible group identified at the top of the form.

DELETING AN APPLICABLE REQUIREMENT FORM

Use the following procedure to delete an AR-001 form:

1. Select the record you would like to delete from your application.
2. Choose **Edit** on the menu bar and select **Delete Applicable Requirement Form**. A screen will appear that identifies the forms associated with the AR-001 form you wish to delete. These forms must be deleted before you can delete the AR-001 form.
3. Once you have deleted all the forms associated with the AR-001 form, delete the AR-001 form (repeat Steps 1 and 2 above).

Note: If there are no forms associated with the AR-001 form you want to delete, the AR-001 form will be deleted in Step 2.

- REMEMBER TO SAVE YOUR CHANGES! -

THE MONITORING, TESTING, RECORDKEEPING, AND REPORTING REQUIREMENTS FORM (AR-002)

The screenshot shows a software window for the AR-002 form. At the top, the title bar reads 'AR-002 MONITORING, TESTING, RECORDKEEPING AND REPORTING REQUIREMENTS'. Below the title bar, there are input fields for 'Form Type' (AR-002), 'SRN' (Z9999), and 'Operator's EU/FG/Source ID' (EUBOILER). A 'Record 1 of 2' indicator is visible in the top right. The main content area is divided into several sections:

- APPLICABLE REQUIREMENT INFORMATION:** Contains fields for 'AQR Applicable Requirement ID' (AR200006), 'Operator's Applicable Requirement ID', 'Applicable Requirement Type', and a checkbox for 'Is This Applicable Requirement Enforceable in a Consent Order (CO) or Consent Judgment (CJ)?'. Below this is a field for 'C/O/CJ number and paragraph number' and an 'Origin' section with 'Permit Number' and 'Action' fields.
- Underlying Applicable Requirement Citation:** Includes a 'UAR' field.
- Applicable Requirement Status Verification:** Contains 'Status Justification', 'Proposed Applicable Requirement Text', and a checkbox for 'Is this a Future Applicable Requirement?'. It also has an 'Enter applicability date' field set to 00/00/0000 and three compliance status questions with checkboxes.
- Associated Applicable Requirements:** A field for listing related requirements.

At the bottom of the window, there are 'Operator's Additional' information fields and a 'Ready' status bar.

FORM OVERVIEW

The Monitoring, Testing, Recordkeeping, and Reporting Requirements Form, AR-002, is used to identify all existing and proposed monitoring/recordkeeping, testing/sampling, reporting, and records maintenance requirements.

It is expected that most existing applicable requirements will remain as they were written in the original document from which they were created. However, certain situations may exist in which an applicable requirement may need to be changed. For example, an existing monitoring and associated recordkeeping requirement may need to be changed in order to comply with other applicable requirements in an ROP or the specific wording of an applicable requirement may need to be changed. Additionally, certain applicable requirements may no longer be applicable and may need to be deleted. There will also be some instances in which new applicable requirements will need to be added to an ROP (e.g., establishing adequate periodic monitoring). The AR-002 form is designed to capture the information necessary for keeping, changing, proposing, or deleting an applicable requirement.

Note: the prompt deviation reporting, semi-annual deviation reporting, and annual compliance certification requirements which appear in the "Reporting" section of your existing ROP do **NOT** have to be included in your ROP application.

As with the AR-001 form, similar applicable requirement types may be reported on a single AR-002 form as long as no changes to any of the requirements are being proposed. If you are going to propose a new applicable requirement or change or delete an existing requirement, you will need to identify that applicable requirement on its own AR-002 form.

FORM RELATIONSHIP



A Monitoring Systems form (MS-001, MS-002, or MS-003) will be linked to this form if the applicable requirement is being proposed.

FORM COMPLETION INSTRUCTIONS

A blank AR-002 form will be created for an emission unit which has at least one AR-001 form in which the “Applicable Requirement Type” was identified as a **material limit, emission limit, visible emission limit, or operational restriction** (see Table 8-1 on page 8-6). The Operator’s EU/FG/Source ID field at the top of the form identifies which emission unit or flexible group that this form is associated with. If there is more than one applicable requirement associated with the emission unit/flexible group, you will have to create additional AR-002 forms as necessary (see “Adding An Applicable Requirement Form” on page 8-20).

The top of the form displays the **Form Type** that is open (AR-002) as well as the facility’s State Registration Number (SRN). Make sure that your SRN appears in the SRN window. Also displayed at the top of the form is the Operator’s EU/FG/Source ID to which this AR-002 form is associated. This ID will be the Operator’s ID that was entered on the EU-003 or FG-001 form or the SRN if the form is associated with a source-wide applicable requirement. Only operator IDs with an associated material limit, emission limit, visible emission limit, or operational restriction chosen as the applicable requirement type on the AR-001 will appear in this field (Figure 8-7).

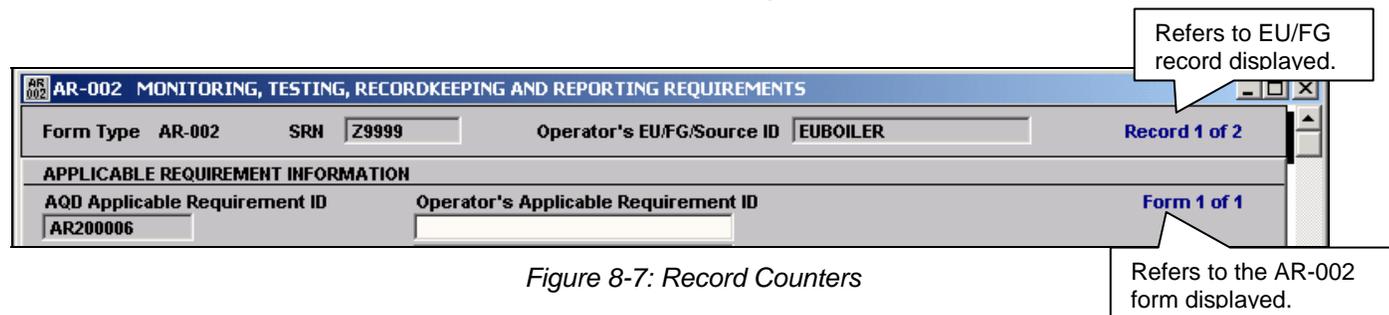


Figure 8-7: Record Counters

A record counter, which identifies the record currently displayed appears in the upper-right corner (Figure 8-7). On this form, “Record 1 of 2” indicates that emission unit or flexible group Record 1 of 2 is currently displayed on the screen. The number in this counter should correspond to the number of emission units, flexible groups, or source-wide applicable requirements that have material limits, emission limits, visible emission limits, or operational restrictions (identified on the AR-001). To move to a different EU/FG, click anywhere in the top section of the form and use the arrow buttons on the tool bar.

Another counter will keep track of the Applicable Requirement Form displayed. This is the number of AR-002 forms associated with the emission unit or flexible group identified at the top of the screen (Figure 8-7). “Form 1 of 1” indicates that there is only one AR-002 associated with the emission unit/flexible group identified at the top of the screen. This counter will be adjusted if an Applicable Requirement Form is added (e.g. Form 2 of 2). To move to a different AR-002 form, use the arrow

buttons on the tool bar, or click on the browse button (the cursor must be in the applicable requirement information section of the form to do this).

Applicable Requirement Information

The screenshot shows a form titled "APPLICABLE REQUIREMENT INFORMATION" with a "Form 1 of 1" label in the top right. The form contains several input fields and checkboxes, each with a circled number pointing to it:

- 1: A text box containing "AR200006" under the label "AQD Applicable Requirement ID".
- 2: A text box under the label "Operator's Applicable Requirement ID".
- 3: A dropdown menu under the label "Applicable Requirement Type".
- 4: A checkbox under the label "Is This Applicable Requirement Enforceable in a Consent Order (CO) or Consent Judgment (CJ)?".
- 5: A text box under the label "Origin".
- 6: A text box under the label "CO/CJ number and paragraph number".
- 7: A text box under the label "Permit Number".
- 8: A dropdown menu under the label "Action".
- 9: A text box under the label "Underlying Applicable Requirement Citation" with "UAR" written above it.

- 1. AQD Applicable Requirement ID:** This is a unique ID assigned to the applicable requirement by the software. This number is automatically assigned and cannot be edited.
- 2. Operator's Applicable Requirement ID:** Enter a unique ID for the applicable requirement(s). The ID should begin with an "AR2" prefix plus any combination of up to 14 letters, numbers, or keyboard characters. Spaces are not allowed within the Applicable Requirement ID. It is recommended that you follow the same protocol for name creating IDs as was done on the AR-001 form. Determine the Applicable Requirement Type in Step 3 and use the Applicable Requirement Type Code from Table 8-2 as an ID prefix.

For example, an Applicable Requirement ID for testing/sampling requirement(s) could be "AR2-TS" Likewise, an Applicable Requirement ID for a monitoring/recordkeeping requirement could be "AR2-MR." If you wish to identify a specific applicable requirement on the form because it is new (being proposed) or you are requesting that it be changed or deleted, then the ID should be more specific such as AR2-TS-003 where the "003" indicates the third testing/sampling requirement for the emission unit or flexible group.

If you choose another numbering system, be sure that you are consistent throughout the application.

Table 8-2: Applicable Requirement Codes for the AR-002 Form

Applicable Requirement Types	Operators Applicable Requirement ID
Monitoring / Recordkeeping	AR2-MR
Testing/Sampling	AR2-TS
Reporting	AR2-RR
Other	AR2-OTHER

3. **Applicable Requirement Type:** Click on this field and a drop-down list of requirement types will appear. These options correspond to the requirement types identified in your existing permit. Using your existing permit as a guide, select the most appropriate requirement type for the applicable requirement(s) you will be entering on this form.
4. **Is This Applicable Requirement Enforceable in a Consent Order (CO) or Consent Judgment (CJ)?:** Select “Yes” if this applicable requirement is enforceable under a CO or CJ. Select “No” if this applicable requirement is not enforceable under a CO or CJ.

If “Yes” is selected in this field, enter the CO/CJ number and paragraph number in the field provided. The CO/CJ Number and Paragraph Number field will not be available if “No” is selected.

5. **Origin:** Using the guidelines below, select the most appropriate origin from the drop-down list.
- The “origin” for all terms and conditions in an existing ROP is the ROP regardless of where the applicable requirement initially originated. If the applicable requirement is in your existing ROP, select “**ROP**” and proceed to Step 6.
 - The “origin” for all terms and conditions of a PTI that have not yet been incorporated into an ROP is the PTI. If the applicable requirement is in a PTI that has not yet been incorporated into your ROP, select “**Permit to Install**” and proceed to Step 6.
 - If the stationary source has recently become subject to an existing or newly promulgated state rule, federal regulation, or federal statute and the limits and restrictions have not yet been incorporated into the ROP or a PTI (e.g., a new MACT standard with new or more stringent monitoring and recordkeeping), select “**Propose**” and complete Steps 9 through 15. Proceed to Step 9.
 - If you are proposing a voluntary, more stringent limit or restriction select “**Propose**” and complete Steps 9 through 15. Proceed to step 9.
 - **Note:** *If an applicable requirement initially originated in a CO or CJ and has not yet been incorporated into an ROP, the CO or CJ must only be identified in Step 4. You do not have to complete Steps 5 through 8.*

When a compliance demonstration method is proposed you must also complete the Proposed Monitoring/Recordkeeping form (MS-001), the Proposed Testing/Sampling form (MS-002), or the Proposed Reporting form (MS-003).

If the applicable requirement initially originated in a CO or CJ and it has already been incorporated into an ROP or PTI, the CO or CJ must be identified in Step 4. The origin and the associated requirement or special condition number from the ROP or PTI must be identified in Steps 5 and 6.

6. **Permit Number:** Enter the Permit to Install or ROP number. If “ROP” or “Permit to Install” was selected in Step 5, enter the associated ROP or PTI number in this field (e.g., MI-ROP-Z9999-2005 or 987-99). Proceed to Step 7.
7. **Requirement/Special Condition No.:** If “ROP” was selected in Step 5, enter the requirement number from the ROP. Use the numbering structure that is in the ROP. Remember, you may group applicable requirements that fall under the same requirement type as long as you are not proposing to make any changes to any of the requirements. For example, the conditions that

appear in Figure 8-8 below may be identified as “VI.1-4.” However, if you are proposing to change or delete a specific requirement, then you need to identify the specific requirement on its own AR-002 form, then enter the specific requirement number such as “VI.1”.

If “Permit to Install” was selected in Step 5, use a similar naming format to identify a single requirement (e.g. SC 1.2) or group of requirements (SC 3.1-3.4) in the existing PTI. Proceed to Step 8.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))

1. The permittee shall record the reducer and coating usage for EUTEST: monthly record.² (R 336.1213(3))
2. The permittee shall record the VOC content (pounds per gallon) and water content for all coatings, as well as the density of reducer: monthly record. (R 336.1213(3))
3. The permittee shall record the production hours for EUTEST: monthly record. (R 336.1213(3))
4. The permittee shall calculate and maintain records of the VOC emission rate in pounds per hour, tons per 12-month rolling time period, and pounds per gallon of coating, minus water, as applied: monthly record. (R 336.1213(3), R 336.1702(c) and (d), R 336.2040(12)(b) and (d))

See Appendix 7

Figure 8-8: ROP Applicable Requirements

8. Action: Choose the action that is to be taken on the applicable requirement(s).

- Select “**Keep**” if the existing applicable requirement(s) identified in step 7 is acceptable and no changes are necessary.
- Select “**Change**” if the existing applicable requirement identified in step 7 needs to be modified or altered to ensure continued compliance. “Change” should be used only for very minor changes to a requirement which do not affect the meaning or intent of the requirement. A justification must be provided in Step 10.
- Select “**Delete**” if the existing applicable requirement identified in step 7 is obsolete. A justification must be provided in Step 10.

9. Underlying Applicable Requirement Citation: The underlying applicable requirements (UAR) are the state rules or federal regulations on which the applicable requirement is based. UARs are listed after each of the applicable requirements in your existing permit.

If you want to keep the UARs for the requirement as they appear in your existing permit, enter “**Keep UAR**” in this field.

If you wish to make a change to a UAR in the existing permit, you should enter the appropriate UAR in this field. All UARs should be entered using the following formats:

- State Rules: R 336.1201(1)(a)(iv)
- Federal Regulations: 40 CFR 60.1(a)(1)(iv)(B)
- Michigan Compiled Law (the Michigan NREP Act): MCL 324.5504(1)(a)(iv)

If the applicable requirement has more than one UAR you will need to add a UAR field. To add additional fields, go to the **Edit** menu and select **Add UAR**. To delete a UAR that was entered, select the UAR to be deleted, go to the **Edit** menu and select **Delete UAR**.

Applicable Requirement Status Verification

The screenshot shows a form titled "Applicable Requirement Status Verification". It contains several sections and fields:

- 10** **Applicable Requirement Status Verification Status Justification**: A text input field.
- 11** **Proposed Applicable Requirement Text**: A text input field.
- 12** **Is this a Future Applicable Requirement?**: A dropdown menu.
- 13** **Enter applicability date**: A date input field with the value "00/00/0000".
- 13** **Compliance Status**: A dropdown menu.
- 14** **Is this emission unit or flexible group in compliance with this applicable requirement?**: A dropdown menu.
- 14** **Will this emission unit or flexible group continue to be in compliance with this applicable requirement?**: A dropdown menu.
- 15** **If this applicable requirement is a future applicable requirement, will timely compliance be achieved?**: A dropdown menu.
- 16** **Associated Applicable Requirements**: A text input field.

- 10. Status Justification:** If the applicable requirement is being proposed, changed, or deleted, enter the justification.
- 11. Proposed Applicable Requirement Text:** If changing or proposing an applicable requirement, provide the proposed applicable requirement text (text may be taken directly from the rule or regulation).
- 12. Is this a Future Applicable Requirement?:** Select "Yes" if the UAR identified in Step 9 has been or will be promulgated prior to issuance of the ROP and has future compliance deadlines. Select "No" if the applicability date for the identified UAR has been or will be reached prior to issuance of the ROP.

If "Yes" is selected enter the date of future applicability in the following field provided.

Compliance Status:

If you grouped several requirements of the same type together in step 7, answer this question as it applies to ALL the requirements identified in step 7. If the emission unit/flexible group is not in compliance with a requirement identified in step 7 then you should select "No."

If "No" is selected for any of the following reasons, submit a narrative compliance plan including a schedule for compliance on an AI-001 (see Rules 103(ee) and 119(a) in Appendix C for the definition of "compliance plan" and schedule of compliance"). The Compliance Status fields are not required for proposed requirements.

- 13. Is this emission unit or flexible group in compliance with this applicable requirement?:**
- Select "Yes" if the emission unit or flexible group is currently in compliance with the identified applicable requirement(s) identified in step 7.
 - Select "No" if the emission unit or flexible group is not currently in compliance with the applicable requirement(s) identified in step 7. Submit a narrative compliance plan including a schedule for compliance using an AI-001 form (see Step 17).
 - Leave this field blank if the applicable requirement has future applicability. Proceed to Step 15.

14. Will this emission unit or flexible group continue to be in compliance with this applicable requirement?: Only complete if “Yes” was selected in Step 13.

- Select “Yes” if the emission unit or flexible group will continue to comply with the applicable requirement(s) identified in step 7.
- Select “No” if the emission unit or flexible group will not continue to comply with the applicable requirement(s) identified in step 7. Submit a narrative compliance plan including a schedule for compliance using an AI-001 form (see Step 17).
- Leave this field blank if the applicable requirement has future applicability or you answered “No” in Step 13. Proceed to Step 15.

15. If this applicable requirement is a future applicable requirement, will timely compliance be achieved?: Only complete if the applicable requirement has future applicability.

- Select “Yes” if your source intends to comply with the provisions of the future applicable requirement prior to the compliance deadline.
- Select “No” if your source will be in violation of the future applicable requirement at the time of the compliance deadline. Submit a narrative compliance plan including a schedule for compliance using an AI-001 form (see Step 17).
- Leave this field blank if the applicable requirement is not a future applicable requirement.

16. Associated Applicable Requirements: The ROP Program requires monitoring/recordkeeping, testing/sampling, and/or reporting to document compliance with each emission limit, material limit, visible emission limit, and operational restriction. These associated applicable requirements are already identified in most ROPs issued after 2003 (see Figure 8-9).

I. <u>EMISSION LIMIT(S)</u>					
Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
VOC	134 pounds per hour ²	Operating hours in a calendar month	EUSEALER	VI.4 / V.1	R 336.1201 R 336.1702
	307.2 tons per year ²	12 month rolling total			
	Pound per gallon limits as specified in R 336.1621(1)	Daily average			R 336.1213(2) R 336.1621(1) R 336.1702(d)

Compliance method

Figure 8-9: Associated ARs in ROP

Click on this field and a drop-down list containing all the Operator’s Applicable Requirement IDs established on the AR-001 form which are associated with the emission unit or flexible group appear (Figure 8-10).

Select the Operator’s Applicable Requirement ID for which the applicable requirement(s) on this AR-002 form are used to document compliance. If the applicable requirement(s) on this AR-002 form documents compliance with more than one applicable requirement on the AR-001 forms, you may select another ID by going to the **Edit** menu and selecting **Add Applicable Requirement ID**.

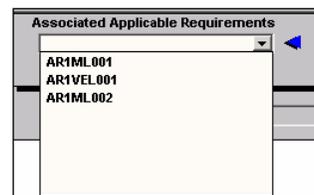


Figure 8-10: Associated ARs drop-down list

- 17. Operator's Additional Information ID:** An Additional Information Form (AI-001) may be used to supplement any of the information required on this form. Click on the "Display Additional Information Form" button to associate this form with an AI-001 form. When you click on this button either a blank AI-001 form will be generated for you to complete or a display window that contains AI-001 forms that have been created and not linked to another form will appear. If the display window appears select one of the AI-001 forms that have already been created and click "OK" or choose "New" to generate a blank AI-001 form. Refer to Chapter 11 for instructions on how to complete the AI-001 form and create an Operator's Additional Information ID.

If an Operator's Additional Information ID appears in this field and you would like to view the AI-001 form associated with it, click on the "Display Addition Information Form" button. If you would like to break the link to this form, click on the "Clear Additional Information ID" button. Although the ID will be cleared, the AI-001 form will still exist and can be linked to another form or deleted. Refer to Chapter 11 for guidance on deleting an AI-001 form.

ADDING AN APPLICABLE REQUIREMENT UNIT FORM

Usually an emission unit or flexible group will have more than one applicable requirement associated with it. Use the following procedure to add an AR-002 form:

1. Choose **Edit** on the menu bar and select **Add Applicable Requirement Form**.
2. A new AR-002 form will be generated to complete for the emission unit or flexible group identified at the top of the form.

DELETING AN APPLICABLE REQUIREMENT FORM

Use the following procedure to delete an applicable requirement record from your ROP application:

1. Select the record you would like to delete from your application.
2. Choose **Edit** on the menu bar and select **Delete Applicable Requirement Form**. A screen will appear that identifies the forms associated with the AR-002 form you wish to delete. These forms must be deleted before you can delete the AR-002 form.
3. Once you have deleted all the forms associated with the AR-002 form, delete the AR-002 form (repeat Steps 1 and 2 above).

Note: If there are no forms associated with the AR-002 form you want to delete, the AR-002 form will be deleted in Step 2.

- REMEMBER TO SAVE YOUR CHANGES! -