What You Need to Know About the Renewable Operating Permit Process

What prompts getting an ROP
1) How is “major source” defined
2) Title V background – ROPs in Michigan

There are two application processes for ROPs
1) Initial ROP or
2) Renewal ROP

Initial ROPs
1) There are three ways an Initial ROP begins…
   • Existing Company adds equipment that puts their Potential to Emit (PTE) over Major Source Thresholds.
   • A new company is constructed and the PTE is greater than Major Source Thresholds, which is identified during PTI discussions
   • A company exceeds the emission limits in an ROP opt out permit
2) Application Process
   • Initial ROP Applications need to be submitted within 12-months of the source becoming major (when the PTI is issued or when emission limits are exceeded).

ROP Renewal
1) AQD Contacts the Company within 18 months prior to the ROP Expiration
   • This is done by a letter to the Responsible Official
2) Application must be submitted at least 6 months prior to the expiration date of the ROP. If an administratively complete application is not submitted by then, the Application Shield will be lost.

The Pre-Application Meeting… (For both Initial and Renewal)
1) Who should attend?
   • District Staff
   • District Supervisor
   • Environmental Contacts at the Company
   • Company Consultants (If applicable)
   Note: Get this scheduled as soon as possible, to get the ball rolling while the PTI? is being developed
2) What is it?
3) Timeline
   • Show and tell about the timeline

Information to gather before starting the Initial application process
1) Applicable State & Federal Regulations
2) NSPS, MACTs (NESHAPs), CAM, etc.
3) Any necessary plans
   • CAM, Malfunction Abatement Plan (MAP), fugitive dust plans
4) Current Compliance Status (if necessary)
5) Any Consent Orders (if applicable)
**Information to gather before beginning the Renewal process**

1. Any New PTIs that need to be incorporated
2. New Federal Regulations that apply
3. Current Compliance Status (if necessary)
4. Any Consent Orders (if applicable)
5. Any Potential Future Changes at the Company

**Current ROP**

- is located where?

**Filling out forms**

1. No more PASS ROP for initial applications
2. Where do you find initial forms?
3. Where do you find renewal forms?
4. Hard copy vs email
5. Where to send the application

**AQDs Role**

1. Administrative Completeness
   - Once received, AQD has 15 days to review the electronic application (60 for paper submittal only) to determine completeness.
   - Initial applications can use the “ROP Renewal Application Administrative Completeness Checklist” as a guide

2. Application Shield
   - An application shield is “the ability to operate the process and process equipment at a stationary source while a timely and administratively complete application is being reviewed and acted upon by the department.”
   - Failure to provide a timely response to information requests may result in loss of the application shield.

3. AQDs sends letter of receipt, which will include whether or not your application was timely or not, whether you have an application shield or not.

**Working draft**

**Public Participation Process**

- 30 day public comment
- 45 day EPA review

**Resources**

- New Initial Application and instructions will be posted on the AQD website soon.
- Renewal Application and instructions
- ROP Manual
- Life after ROP