

What's New in Title V

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What's New?

- ROP Renewal Application Changes
- PTE Calculations Required in Application
- Updates to Guidance Documents
- Internal Peer Review Process Initiative
- Training
- Testing Methodology

ROP Renewal Application Changes

- Addition of question regarding non-applicable requirements
- Relocation of some questions to Part C (Source Requirement Information)
- ROP surveys and associated emails were revised so they can be used for both the initial and renewal streamlined application processes.
- PASS-ROP does not function in Windows 10, no longer using this platform
- If a CAM plan is included, check the type of proposed monitoring included in the Plan:
 1. Monitoring proposed by the source based on performance of the control device, or
 2. Presumptively Acceptable Monitoring, if eligible
- Removal of Greenhouse Gas PTE question
- Replacement of Clean Air Interstate Rule (CAIR) with Cross-State Air Pollution Rule (CSAPR) question
- Requirement added to provide PTE calculations for criteria pollutants and HAPs if there are changes

PTI EXEMPTION TABLE CHANGES

- R287(2)(c) - Any emission unit installed/modified after 12/20/2016
- R290 - Any emission unit installed/modified after 12/20/2016

PTE Calculations Required in Application

- Initial application requires PTE of all pollutants
- Renewal application requires PTE calculations if changes have occurred at the facility

Updates to Guidance Documents

- ROP Manual www.michigan.gov/documents/deq/deq-aqd-rop-manual_toc559807_7.pdf
- Initial Applications using new ROP Initial Forms March 20, 2018
- Renewal Applications using ROP Renewal Form March 20, 2018
- NESHAP / MACT, NSPS and Other Guidance 3/20/18-Links updated
- Rules in the State Implementation Plan (SIP)
- Accessing Michigan SIP Submittals Information 2/13/18
- ROP Staff Report Instructions and Updated for CAM Apr. 19 18
- ROP Shell Instructions and Updated for CAM Apr. 23 18
- Technical Review Procedures for Initial and Renewal ROPs Mar. 14 18
- Guidance for Peer Review or ROPs Apr. 16 18
- Public Participation Procedures for ROPs Apr. 24 18

Field Information Training Team (FITT) Public Participation Procedures - 8/24/17

- Procedures for Issuance of Non-ROP Renewable Permits (Acid Rain) and Inc. into ROPs 2/6/18
- Life After ROP - Workbook 8/23/17

Webpage Design

- Part of LPI Initiative
- Larger Font
- Removed broken links
- Removed obsolete links

Internal Peer Review Process Initiative

- Part of LPI Initiative
- Implemented for consistency
- 25% of ROPs from each District Office
- Process reviewed in one year from implementation to gauge efficiency

Internal Peer Review Process Initiative

- General Review
 - Example of Items Reviewed:
 - Were the ROP templates followed?
 - Have all PTIs/applicable regs been incorporated?
 - Are the correct footnotes being used?
- Subject Matter Experts Review
 - Subject matter includes MACTs, specific source types (power plants, chemical plants, auto plants, coating sources, oil and gas, steel mills, landfills, etc.), Acid Rain Permits, CSAPR, and CAM
- Response to Comments Review
 - Focuses on consistency in responses to comments
 - Involves SMEs when necessary
 - Reviews the public comment and permit documents to make sure all relevant comments are addressed, and that the response is appropriate and up-to-date

Training

- Part of LPI Initiative
- Internal training developed and presented this spring
- Working on external training, similar to PTI workshops, hold twice/year.
- Or alternatively, training may be a webinar

Testing Methodology

- EPA requested in PTIs
- Carried through to ROPs
- Specify which test method used to verify compliance with emission limit
 - www.Michigan.gov/air