



Michigan Department of Environment, Great Lakes,  
and Energy - Air Quality Division

# **RENEWABLE OPERATING PERMIT**

# **RENEWAL APPLICATION INSTRUCTIONS**

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# GENERAL INSTRUCTIONS

## INTRODUCTION

This guide has been designed to help you complete and submit an administratively complete Renewable Operating Permit (ROP) renewal application. The guide provides instructions for completing the three (3) components of the ROP renewal application, which includes the ROP Renewal Application Form, a mark-up copy of the ROP, and any necessary supplemental information. You will also find instructions for submitting your ROP Application to the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD).

## BACKGROUND

The ROP Program was developed in response to changes that Congress made to the federal Clean Air Act in 1990. Title V of the Clean Air Act Amendments of 1990 requires each state to develop an ROP Program for all major sources of air contaminants. Federal rules provide guidance to the states on establishing Title V programs. At the state level, the federal Title V requirements are incorporated into [Section 5506](#) and [Section 5507](#) of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994, P.A. 451 as amended (Act 451) and Part 2 of Michigan's Air Pollution Control Rules as the ROP Program which is administered by the AQD. The ROP Renewal Application Form was developed in accordance with the Michigan [Part 2 Rules](#) and Title 40, [Part 70](#) of the Code of Federal Regulations (CFR).

The ROP Program is intended to simplify and clarify a subject facility's applicable requirements (as defined in Rule 101(o)) and compliance with them by consolidating all state and federal air quality requirements into one document. All Permits to Install (PTI) and all other applicable air pollution requirements that apply to the facility will be incorporated into one permit. An ROP does not add new requirements; however, many facilities may have to establish new monitoring and/or recordkeeping requirements to demonstrate compliance with emission limits and material usage limits when none are provided by the existing regulations.

Once a source receives its ROP, the burden of proof that the source is in compliance with the applicable requirements contained in its ROP is shifted from the regulatory agency to the source. Thus, it becomes the source's responsibility to determine whether a deviation has occurred and to report findings to both the AQD and the United States Environmental Protection Agency (USEPA). The facility must regularly track its compliance with state and federal air quality requirements identified in its ROP and certify reports describing its compliance to the two regulatory agencies as specified by the ROP.

The requirements for the ROP Program in Michigan are found in R 336.1210 to R 336.1218 ([Rules 210-218](#)) of the Michigan Air Pollution Control Rules. The Michigan Air Pollution Control Rules can be accessed at [www.michigan.gov/air](http://www.michigan.gov/air) (select News & Info, "State Air Laws and Rules" then "Air Pollution Control Rules").

## WHO IS SUBJECT TO THE ROP PROGRAM?

[Rule 211](#) of the Michigan Air Pollution Control Rules outlines what sources are subject to the ROP Program. Essentially, all **major sources** of air pollution are subject to the ROP Program as well as some non-major sources identified in Rule 211. The Clean Air Act contains several definitions of major source. To put it simply, any facility in Michigan that has the potential to emit 10 tons per year of any one hazardous air pollutant (HAP), 25 tons per year of any combination of HAPs, or 100 tons per year of any other regulated air contaminant is considered a major source and is subject to the ROP Program.

In addition, sources that are not major as identified above may still have to obtain an ROP. These include sources subject to the Acid Rain requirements, sources subject to certain New Source Performance Standards (NSPS) or Area Source Maximum Achievable Control Technology (MACTs), as well as all sources identified in 40 CFR 70.3(a) and Rule 211 of the Michigan Air Pollution Control Rules.

It is important to remember that the ROP requirements are dependent upon a facility's **potential to emit**, not its actual emissions. Potential to emit is the maximum amount of air contaminants that all of the emission units at the facility or source are capable of emitting annually if they were operated at their maximum hourly rate for 8,760 hours per year, or per federally enforceable emission limits incorporated into a PTI or in PTI exemption Rules 287(2)(c) and 290. More information can be found at <http://michigan.gov/air> (select the Permits Tab, then "Air Permitting-Potential to Emit").

### ROP RENEWAL APPLICATION REQUIREMENTS

Each ROP is issued for a fixed term of five years, then it must be renewed. According to Rule 210(7) of the Michigan Air Pollution Control Rules, an administratively complete application for renewal of an ROP must be received by the AQD not more than **18 months**, but not less than **six months**, before the expiration date of the current ROP. This means that you have a 12-month window in which you may submit your ROP application (Figure 1). **DO NOT** wait until the deadline to submit your ROP renewal application. Take into consideration that your ROP application could be returned to you if it is not administratively complete. It is typically best to submit the renewal application 9 to 12 months before expiration. That way, there should be plenty of time to ensure that the application is administratively complete.

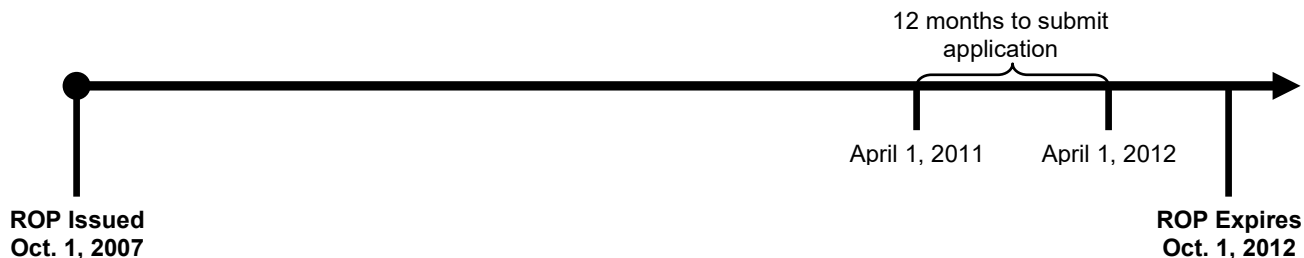


Figure 1: Example ROP Renewal Timeline

An administratively complete ROP application must contain, at a minimum, the information listed in [Section 5507\(f\)](#) of Act 451, part of which is listed below. This information is necessary to evaluate the source and to determine all applicable requirements.

- Citation and description of all applicable requirements
- Identification of applicable test methods for determining compliance with applicable requirements and any other information necessary to implement and enforce applicable requirements or determine applicability
- Emissions calculations necessary to demonstrate compliance with all applicable emission limitations and standards
- Information on fuels, fuel use, raw materials, production rates, and operating schedules, to the extent it is needed to determine or regulate emissions
- Identification of all emission limits or work practice standards
- Descriptions of air pollution control equipment and compliance monitoring devices
- Identification of stack height limitations
- Information necessary to define alternative operating scenarios

The ROP renewal application package consists of three components:

1. The completed ROP Renewal Application Form
2. A mark-up copy of the existing ROP, using the official Word version of the ROP from the AQD website (see page 27 for additional information)
3. Supplemental information (e.g., PTIs not yet incorporated into the ROP, required air emissions data not currently being reported using the Michigan Air Emissions Reporting System (MAERS), Acid Rain Permit, etc.). The ROP Renewal Application Form (Section B) will help you identify if any supplemental information should be submitted as part of your application package.

The ROP renewal application package must include all of the above listed items for it to be considered administratively complete and for the source to receive an "application shield" (see definition below). A hard copy version of the application package **MUST** be submitted to the appropriate AQD District Office with an original signature of the Responsible Official. It is also highly recommended that you submit an electronic version of the application package. The date of receipt of the ROP renewal application package pursuant to Rule 210 is the day the **hard copy** of the application package is received at the appropriate AQD District Office. The AQD will determine administrative completeness for an ROP renewal application through a screening process. If the ROP renewal application is submitted in paper form only, the AQD will make the administrative completeness determination within 60 days. If the application is also submitted electronically the AQD will make the administrative completeness determination within 15 days of receipt.

### **APPLICATION SHIELD**

Rule 210(1) defines an application shield as "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." A renewal application is considered timely pursuant to Rule 210(9) and considered administratively complete pursuant to Rule 210(2). Failure to provide a timely response to information requests may result in loss of the application shield. Loss of the application shield is grounds for enforcement action pursuant to Rule 210(1)

### **SECTIONED ROPs**

An ROP application contains one section by default. It is not necessary to section the permit beyond this default. Multiple sections may be created for a stationary source with multiple physical locations, organizational responsibilities within a source, or multiple owners. Sections should not be created for separating emission units, flexible groups, or buildings within a stationary source. **If your ROP has more than one section, an ROP Renewal Application Form must be completed for each section.**

## GETTING STARTED

### Where Do I Start?

Completing an ROP renewal application can be very confusing if you don't know where to start. Below are four steps you should take before beginning to work on your ROP renewal application.

#### **Step 1: Contact your AQD District Office**

Contact your AQD facility contact to discuss your plans to renew the ROP and setup a pre-application meeting. Appendix C contains contact information for all AQD District Offices.

#### **Step 2: Gather All the Necessary Materials**

Before you begin your ROP Renewal Application Form, gather all the information you need. Some of the items that may be required include:

- The ROP Renewal Application Form. The form can be accessed at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").
- An electronic version of your existing ROP in Microsoft Word from the AQD website. The official AQD Word version of the ROP must be used and can be accessed at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Source List and Permit Documents"). **See Mark-up Instructions pg.26.**
- An electronic version of any PTIs that have been issued to the source and have NOT yet been incorporated in the ROP. These can be downloaded in Adobe Acrobat format (.pdf) at <http://michigan.gov/air> (select the Permits Tab, "Permits to Install (PTI)/New Source Review (NSR)", then "Final Conditions for Active Permits"). If you cannot cut and paste from these files, then contact your AQD District Office to obtain a Microsoft Word version.
- Consent Orders/Consent Judgments
- ROP Modification Applications not acted on by the AQD
- Most recent MAERS submittal. This can be found at <http://maers.state.mi.us/facility/Pages/Main/Login.aspx>
- MAERS Forms (Emissions, Stack, etc.) as needed for emissions not previously reported to MAERS. The forms can be accessed at <http://michigan.gov/air> (select the Emissions Tab, then "Forms & Documents").
- NSPS/MACT Templates and Blank Emission Unit/Flexible Group Templates as needed. These can be accessed at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

#### **Step 3: Review Your Existing ROP**

You will be asked several questions about your existing ROP in the ROP Renewal Application Form. You will also need to mark up your existing ROP with any changes you indicate on the application form. Read through your existing ROP and compare the information contained in it to what is currently at your facility. Does everything match up? If you have installed or removed emission units and your existing ROP does not reflect these changes, you will need to make sure the information is entered correctly into your ROP renewal application.

Make a note of any equipment that is in your facility but not included in the ROP. If a PTI was obtained for the equipment, have it available. You will need to enter information about this new PTI into the application form. Other equipment at your facility that does not appear in your existing ROP may or may not have to be included in the ROP application depending on whether it is grandfathered, exempt under the PTI exemption rules, and whether it has specific applicable requirements.

Also make a note of the equipment that is in your ROP but no longer in operation at your facility, either because it was removed or rendered permanently inoperable. You will need to update this information in your application.

#### **Step 4: Identify Any New Requirements**

Is your source subject, or will it become subject, to any new state or federal regulations (e.g. a new Maximum Achievable Control Technology (MACT) standard)? If so, are the requirements in your existing ROP? If you are subject to new requirements and they have not yet been added to your ROP, you must include them in your ROP application. For example, if your source is subject to a MACT standard that was recently promulgated, and that standard contains new applicable requirements, you will need to identify the regulation and corresponding requirements in your ROP application. The AQD has developed template tables for some MACT and NSPS requirements. Check the AQD website for templates and other guidance: <http://michigan.gov/air> (select the Permits Tab, then “MACT Determinations”).

If your facility is subject to any new PTIs or Consent Orders/Judgments, they will contain requirements which must be included in your ROP. If the requirements in the new PTIs or Consent Order/Judgment are not in your existing ROP, make a note of them. They will need to be identified in your application.

### **ROP PROGRAM RESOURCES**

In addition to these instructions, there are several other resources you may wish to refer to for guidance in completing and submitting your ROP application. They include:

#### **Online Tutorials**

A tutorial that explains how to complete and submit an administratively complete ROP renewal application can be viewed at <http://michigan.gov/deqworkshops> (under the Other Training Opportunities heading, click on “EGLE On-Demand Training”).

#### **The Environmental Air Assistance Program**

The Environmental Assistance Program can help with your ROP related questions and can be contacted by calling the Environmental Assistance Center at (800) 662-9278 or on the Internet at <http://michigan.gov/air> (select the Compliance Tab, then “Clean Air Assistance Program” under Compliance Information).

#### **EGLE, Air Quality Division Permits Web Site**

The Air Quality Division Permits web site provides information about the PTI Program, ROP Program, MACT determinations, Acid Rain Permits, and other links of interest. From this web site, you can view ROP Program support documents and application forms, a list of subject sources, public notice documents, as well as a list of draft, proposed, and issued ROPs. The Air Quality Division Permits web site can be accessed at [www.michigan.gov/air](http://www.michigan.gov/air) (select the Permits Tab, then “Air Quality Division Permits”).

# ROP RENEWAL APPLICATION FORM INSTRUCTIONS

The ROP Renewal Application Form has been designed to help you complete and submit an administratively complete ROP renewal application. The form can be accessed at <http://michigan.gov/air> (select the Permits Tab, “Renewable Operating Permits (ROP)/Title V”, then “ROP Forms & Templates”). In addition to the application form, you will also need to submit a mark-up copy of your ROP using the official version from the AQD website and any other supplemental information that is identified as being necessary in the form. Applicants should contact their AQD District Office for assistance when needed.

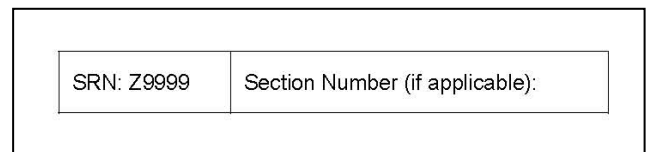
## Overview

The form is divided into 8 parts.

- Part A: General Information
- Part B: Submittal and Certification
- Part C: Source Requirement Information
- Part D: Permit to Install (PTI) Exempt Emission Unit Information
- Part E: Existing ROP Information
- Part F: Permit to Install (PTI) Information
- Part G: Emission Units Meeting the Criteria of Rule 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290
- Part H: Requirements for Addition or Change
- An AI-001 Form is also included for use as needed (see below)

Each of these parts collects information necessary for your application to be administratively complete. A majority of the questions need a “Yes” or “No” response. Be sure to answer all questions unless specifically directed to do otherwise.

Remember that if the ROP has more than one section, a separate ROP Renewal Application Form MUST be completed for each section. In the upper right corner of the application form there is a field to identify the corresponding section number (Figure 2). Be sure to complete this box. You do not have to enter a section number if your permit is not sectioned.



SRN: Z9999	Section Number (if applicable):
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Figure 2: SRN and Section Number Field

## Additional Information Form

An Additional Information Form (AI-001) may be used to supplement any of the information required on the application form. A box appears at the end of most parts of the application form indicating that an AI-001 Form has been attached. Instructions for completing the AI-001 Form can be found on page 25.

If you complete AI-001 Forms, it is recommended that you complete a separate one for each part of the application. For example, if you are supplementing information needed in Parts E and H, you complete one AI-001 Form for Part E and one AI-001 Form for Part H.



## PART A: GENERAL INFORMATION

This part of the application form collects basic information about the facility including location and owner information as well as information about the contact and responsible official.

### Source Information

**SRN:** Enter the source's state registration number (SRN).

**SIC Code:** Enter the Standard Industrial Classification (SIC) code that best describes the major product produced or service provided by your source. SIC code information can be found at <http://www.osha.gov/pls/imis/sicsearch.html>.

**NAICS Code:** Enter the North American Industrial Classification System (NAICS) Code that best describes the major product produced or service provided by your source. This code must be a five-digit numeric code. NAICS code information can be found on the internet at <http://census.gov/eos/www/naics>. This code can also be found in your previous ROP applications and MAERS Reports.

**Existing ROP Number:** Enter the ROP number that appears on your existing permit (e.g. MI-ROP-Z9999-2007).

**Section Number:** If the ROP is sectioned, enter the appropriate section number. Note that a separate ROP Renewal Application Form should be completed for each section of a sectioned ROP and must be signed and certified by the appropriate Responsible Official(s).

**Source Name:** Enter the specific name that identifies the stationary source.

**Street Address, City, State, Zip Code, and County:** Enter the physical address of the stationary source location. DO NOT use a post office box number.

**Section/Town/Range:** Only complete this field if a street address is not available.

**Source Description:** Enter a brief description of the source's processes and products.

### Owner Information

**Owner Name:** Enter the name of the owner or parent/holding company (e.g., Big Widget Corp., Middletown Board of Education, Joe Clean).

**Mailing Address:** If the owner's address is identical to the source address, check the box as indicated in this field. If the owner address is different than the source address, complete these fields. Fill out the name and address exactly the way it should appear on all correspondence.

## Contact Information

The contact is the person the AQD will contact if they have questions about the ROP renewal application. The form provides room to enter up to two contacts for the facility.

**Contact Identification:** Information about the source contact should be entered in these fields.

Enter the name, company name, mailing address, telephone number, fax number, and e-mail address for each contact. If the contact's address is the same as the source address, check the box where indicated in the field.

### Responsible Official Information

The Responsible Official is the person that certifies the information in the ROP application package as truthful and accurate. Only certain individuals may be considered a "Responsible Official." Rule 118(j) provides the Responsible Official criteria. The form provides room to enter up to two responsible officials for the facility.

**Responsible Official Identification:** Information about the source's Responsible Official should be entered in these fields. A Responsible Official must meet the criteria specified in Rule 118(j).

Enter the name, company name, mailing address, telephone number, fax number, and e-mail address for the Responsible Official. If the Responsible Official's address is the same as the source address, check the box where indicated in the field.

**PART B: APPLICATION SUBMITTAL AND CERTIFICATION BY RESPONSIBLE OFFICIAL**

This part of the application form is used to identify the items that are included as part of your administratively complete application and to certify the application. You may want to wait until you have completed the rest of the application form before completing this Part.

**Listing of ROP Application Contents**

Listing of ROP Application Contents. Check the box for the items included with your application.	
<input type="checkbox"/> Completed ROP Renewal Application Form (and any AI-001 Forms) (required)	<input type="checkbox"/> Compliance Plan/Schedule of Compliance
<input type="checkbox"/> Mark-up copy of existing ROP using official version from the AQD website (required)	<input type="checkbox"/> Stack information
<input type="checkbox"/> Copies of all Permit(s) to Install (PTIs) that have not been incorporated into existing ROP (required)	<input type="checkbox"/> Acid Rain Permit Initial/Renewal Application
<input type="checkbox"/> Criteria Pollutant/Hazardous Air Pollutant (HAP) Potential to Emit Calculations	<input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information
<input type="checkbox"/> MAERS Forms (to report emissions not previously submitted)	<input type="checkbox"/> Confidential Information
<input type="checkbox"/> Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP	<input type="checkbox"/> Paper copy of all documentation provided (required)
<input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan	<input type="checkbox"/> Electronic documents provided (optional)
<input type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	<input type="checkbox"/> Other, explain:

*Figure 3 – Listing of ROP Application Contents*

Use this table to identify the necessary items that are being submitted as part of your ROP application. For your application to be complete, it must include all of the following: a mark-up of the ROP, all PTIs that have not already been incorporated into the existing ROP, and all supplemental documentation required as a part of the application package. Other items that must be included but are only applicable to some sources are also listed in this table. For instance, you may not have a consent order or Acid Rain Permit associated with your source.

**Compliance Statement**

Answer each of the compliance statements as they pertain to all the applicable requirements to which the source is subject. You should make a “reasonable inquiry” into each ROP condition and all other applicable requirements that your source is subject to. Essentially, reasonable inquiry requires that the source: 1) verify compliance with every condition in each PTI, as well as any other regulations that the source is subject to and 2) report any known deviations, including situations where a different or no monitoring method is specified by the PTI or the other regulation. If any of the statements are checked “No”, identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source expects to be out of compliance on an AI-001 Form. Provide a compliance plan and schedule of compliance, as defined in Rule 103(dd) and Rule 119(a) (see below) on an AI-001 Form.

Note that the method or methods used to determine compliance for each applicable requirement must be the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

- A “compliance plan” means a description of the compliance status of a source with respect to all applicable requirements for each process or process equipment as follows:
  - (i). For applicable requirements with which the source is in compliance, a statement that the source will continue to comply with the requirements.
  - (ii). For applicable requirements that will become effective during the permit term, a statement that the source will meet the requirements on a timely basis.
  - (iii). For applicable requirements for which the stationary source is not in compliance at the time of permit issuance, a narrative description of how the stationary source will achieve compliance with the requirements.
  
- A “schedule of compliance” means, for purposes of Rule 201 to Rule 218, all of the following:
  - (i). For a source not in compliance with all applicable requirements at the time of issuance of a renewable operating permit, a schedule of remedial measures, including an enforceable sequence of actions or operations that specifies milestones, leading to compliance with an applicable requirement, and a schedule for submission of certified progress reports, at least every 6 months. The schedule shall resemble, and be at least as stringent as, a schedule contained in a judicial consent decree or administrative order to which the source is subject. A schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirement on which it is based.
  - (ii). For a source in compliance with all applicable requirements at the time of issuance of a renewable operating permit, a statement that the source will continue to comply with the requirements.
  - (iii). With respect to any applicable requirement that has a future effective compliance date that is after the date of issuance and before the date of expiration of the renewable operating permit, the schedule of compliance shall contain a statement that the source will meet the requirement on a timely basis, unless the underlying applicable requirement requires a more detailed schedule.

### **Signature**

The source’s Responsible Official must sign and date this form. The Responsible Official is the person that certifies the information in the ROP application package as truthful and accurate. Only certain individuals may be considered a “Responsible Official.” Rule 118(j) provides the Responsible Official criteria.

The hard copy of the ROP application form sent to the AQD must have an original signature.

If the ROP has more than one section and different Responsible Officials for each section, a separate Part B must be submitted for each section.

## PART C: SOURCE REQUIREMENT INFORMATION

The questions in Part C pertain to specific requirements or programs to which the source may be subject.

- C1. [Section 5507\(1\)\(f\)\(iii\)](#) of Public Act 451 of 1994, as amended (Act 451) requires actual and allowable emission rates in tons per year to be submitted as part of an administratively complete ROP application. Therefore, material throughput and actual emissions data must be reported for each emission unit that is subject to process specific emission limits or standards. This includes emission units identified in the existing ROP, new PTIs and other equipment that have not yet been incorporated into the ROP or may not be subject to permitting requirements (e.g. exempt of grandfathered equipment). The permittee may use the previous year's MAERS submittal to fulfill the requirement for actual emissions. Select "Yes" if there are emission units with applicable requirements that were NOT reported in MAERS during the last reporting year. If "Yes", is selected you will need to identify the emission units that were not reported in MAERS on an AI-001 Form. Emission data for each emission unit not already reported must be provided on hard copy MAERS forms as an attachment.

The MAERS forms can be accessed on the Internet at <http://michigan.gov/air> (select the Emissions Tab, then "Forms & Documents").

- C2. Select "Yes" if this source has any air conditioners or refrigeration equipment that is subject to [40 CFR Part 82](#), Subpart A through G. Otherwise select "No". Any applicable requirements under the federal program regulating ozone-depleting substances (40 CFR Part 82) need not be listed unless the facility is in violation of that specific condition or requirement.

You may be subject to one or more requirements specified in 40 CFR Part 82.1-184 (based on the 1990 Clean Air Act, Title VI and amendments) if the company you operate:

- Manufactures CFCs, HCFCs, and/or chlorinated types of compounds or equipment that use these chemicals or their alternatives.
- Owns, operates, services, repairs and/or recycles air conditioning equipment, home appliances, industrial refrigeration systems, and/or other related industrial refrigerant processes (*Section 608 Refrigerant Recycling Rule*.)
- Services, repairs, and/or recycles motor vehicle air conditioning systems (*Section 609 Motor Vehicle Air Conditioning*).
- Is a microchip manufacturer (use of a specific cleaner) or a foam manufacturer (use of a gas to blow the foam) (*Section 610 Nonessential Product Bans*).
- Uses alternatives or CFC or HCFC solvents for cleaning. (*Section 612 Significant New Alternatives Policy Program*)

- C3. Select "Yes" if this source is subject to the federal Chemical Accident Prevention Provisions pursuant to Clean Air Act Section 112(r). Refer to [40 CFR Part 68](#). If "Yes" is selected, check the box to indicate whether a Risk Management Plan (RMP) has been submitted to the USEPA. Any applicable requirements under the federal Chemical Accident Prevention Provisions (40 CFR Part 68) need not be listed unless the facility is in violation of that specific condition or requirement.

### Who is Subject to the federal Chemical Accident Prevention Provisions?

Companies of all sizes that use certain listed chemicals must submit plans that detail how they will prevent accidental chemical releases from occurring. This compliance requirement is known as the Accidental Release/Risk Management Program of the 1990 Clean Air Act Amendment's Section 112(r). The goal of this regulation is to communicate potential risks to the public and ensure that facilities have implemented a baseline internal management structure that includes safety and prevention and emergency response programs to reduce the possibility of an accidental release. The primary tool used to accomplish this goal is the Risk Management Plan (RMP). A facility must develop an RMP if they have regulated substances (comprised of toxic chemicals and flammables) identified under Section 112(r) at or above a specific threshold quantity that is set for each substance. The size of the company does not determine applicability; a business is required to complete an RMP if the type and quantity of chemicals used are listed as regulated substances under the rule. For more information about the Risk Management Program go to <http://epa.gov/rmp>.

- C4. Select "Yes" if the source has added or modified equipment since the last ROP renewal that changes the PTE of criteria pollutants, regulated by Section 111 of the federal Clean Air Act. If "Yes" is selected, provide potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. If the source belongs to one of the categories listed in Rule 116(n) and 40 CFR 70.2, fugitive emissions **must** be included in the potential emissions calculations. The PTE Workbook provides guidance in determining your potential to emit. The PTE Workbook can be accessed on the internet at <http://michigan.gov/air> (select the Permits Tab, then "Air Permitting – Potential to Emit" under Air Permitting Assistance).

If multiple equipment changes have occurred at your source since the issuance of the Initial ROP, an updated Source-Wide PTE may be requested for any regulated pollutant as part of the technical review of the ROP Renewal Application.

- C5. Select "Yes" if the source has added or modified equipment since the last ROP renewal that changes the PTE of any hazardous air pollutants (HAPs) regulated by Section 112 of the federal Clean Air Act. If "Yes" is selected, provide potential emission calculations (or the PTI and/or ROP revision application numbers, or other references for the PTE demonstration) for the added or modified equipment on an AI-001 Form. Fugitive emissions **must** be included in HAP calculations. Check with your district contact if you have a large number of individual HAPs emitted from your source. The PTE Workbook provides guidance in determining your potential to emit.
- C6. Select "Yes" if any emission units at the stationary source are subject to the federal Cross-State Air Pollution Rule (CSAPR). Identify the specific emission unit(s) subject to CSAPR on an AI-001 Form. Additional information about CSAPR can be found at: <https://epa.gov/csapr>.
- C7. Select "Yes" if any emission units at the stationary source are subject to the federal Acid Rain Program. Identify the specific emission unit(s) subject to the federal Acid Rain Program on an AI-001 Form.

If "Yes", you will need to submit the Acid Rain Permit renewal application with your ROP renewal application package. If you are including these application forms, check the box in C7 to indicate that the appropriate forms have been included with this application. Acid Rain application forms are available from the AQD upon request or at the EPA Acid Rain web site <https://epa.gov/airmarkets/acid-rain-permitting>. Additional information about the Acid Rain

Program can be found at <http://michigan.gov/air> (select the Permits Tab, then “Acid Rain Permits (Title IV)”).

- C8. Stationary sources that are required to obtain an ROP may also have emission units subject to the compliance assurance monitoring (CAM) requirements contained in [40 CFR Part 64](#). If necessary, review the guidance on CAM provided in Appendix B and at <http://michigan.gov/air> (select the Permits Tab, “Renewable Operating Permits (ROP)/Title V”, scroll down to ROP Support and Information, then “Compliance Assurance Monitoring (CAM) Information”). Select “Yes” if the source has any emission units subject to CAM. If you select “Yes”, identify the specific emission unit(s) and the pollutants that are subject to CAM on an AI-001 Form. If a CAM plan has not been previously submitted to the AQD for an emission unit, one must be included with the ROP renewal application on an AI-001 Form. For guidance on preparing a CAM Plan, see the Requirements for CAM Plan Submittals section in the “CAM Fact Sheet” under “CAM Information” at the website above. If a CAM plan was previously submitted and has been incorporated into the existing ROP, reference the submittal date on the AI-001 Form. If the company wants to make changes to the CAM Plan, a revised plan should be included with the ROP renewal application. If a CAM plan is included with this application, check the box as indicated in question C8.

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 pursuant to standards under Sections 111 or 112 of the federal Clean Air Act that were proposed after November 15, 1990.

- C9. Select “Yes” if the stationary source has any monitoring plans including malfunction abatement plans, fugitive dust plans, operation/maintenance plans, startup/shutdown plans, or any other monitoring plans that are required in an existing ROP, PTI requirement, or required by any other applicable requirement, such as a federal NESHAP/MACT/NSPS. Make sure to submit the most recent version of any plan.
- C10. The ROP application package may be used to identify a specific requirement that the source proposes to be identified in the ROP as not applicable because it might logically otherwise be expected to apply (e.g. confirmation that the emission unit is not subject to a specific New Source Performance Standard (NESHAP)). These requirements should be identified on an AI-001 Form with justification to support why each is not applicable.

**PART D: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNIT INFORMATION**

Use the table provided in this part to identify all emission units exempt from the requirement to obtain a PTI under R 336.1281 – R 336.1289 (Rules 281 – 289) that are included in R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules. These are emission units that are not included in the existing ROP but are required to be listed in the ROP application. You may group identical emission units (e.g., space heaters under Rule 282(2)(b)). If needed, list additional PTI exempt emission units on an AI-001 Form.

**If an emission unit is listed under Rule 212 but has applicable requirements, it must be captured in the ROP Renewal Application Form on either Parts G or H.** For example, emission units exempt from PTI under Rule 287(2)(c) should not be listed here since they have applicable requirements that need to be captured in the ROP and are included on Part G.

D1. Select “Yes”, if the source has any emission units that do not appear in the existing ROP and are required to be listed in the application under Rule 212(4) of the Michigan Air Pollution Control Rules. Identify the emission units that are listed in Rule 212(4) in the table as shown in Figure 4 below.

Select “No” if there are no emission units that are listed in Rule 212(4) and go to Part E.

<b>Emission Unit ID</b>	<b>Emission Unit Description</b>	<b>Rule 212(4) Citation</b> [e.g. Rule 212(4)(c)]	<b>Rule 201 Exemption Rule Citation</b> [e.g. Rule 282(2)(b)(i)]
EU-SPACEHTRS	5 natural gas fired space heaters. All heaters are less than 100,000 Btu/hr	Rule 212(4)(c)	Rule 282(2)(b)(i)
EU-LPGTANKS	2 LPG storage tanks. Each with storage capacity of 6,000 gallons	Rule 212(4)(d)	Rule 284(2)(b)

*Figure 4 – PTI exempt emission unit table from Part D*



**PART E: EXISTING ROP INFORMATION**

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP. Answer the questions as they pertain to all emission units and all applicable requirements in the existing ROP.

E1. Select “Yes”, if you are proposing to make any changes, additions, or deletions to the existing ROP. Examples include making administrative changes to the text within the permit, incorporating the conditions from a Permit to Install (PTI) or incorporating the requirements from a regulation (e.g. a MACT standard). In most cases, you will have obtained a PTI to add or change conditions. The PTI will need to be identified in Part F of this application. Other additions or changes that do not involve a PTI will have to be identified in Parts G or H of the application.

If you select “Yes”, use Parts F, G, or H to describe the proposed changes or additions. Changes will need to be identified in the mark-up copy of your ROP.

Select “No,” if you want to keep ALL the conditions in your existing ROP without any changes.

**Note:** A copy of the existing ROP is required to be included in the application package regardless of whether “Yes” or “No” is answered in this question.

E2. Review the stack/vent requirements associated with each emission unit in your existing ROP (Figure 5). Stacks with applicable requirements in the existing ROP must be identified in the ROP renewal application. To meet this requirement companies can refer to stack information that was previously reported in MAERS. If any stacks with applicable requirements were NOT reported in the source’s previous MAERS report, then select “Yes”. Identify the stacks that were not in MAERS on the MAERS Stack Form (SV-101), which can be accessed at <http://michigan.gov/air> (select the Emissions Tab, then “Forms & Documents”).

<b>VIII. STACK/VENT RESTRICTION(S)</b>			
The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:			
<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SVBoiler1	30 <sup>2</sup>	28 <sup>2</sup>	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)
2. SVBoiler2	24 <sup>2</sup>	44 <sup>2</sup>	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)
3. SVBoiler3	24 <sup>2</sup>	46 <sup>2</sup>	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

*Figure 5: Stack/Vent Restriction(s)*

E3. Select “Yes” if any emission units have been modified or reconstructed as defined in Rules 113(e) or 118(b), respectively. If “Yes” is selected, identify the emission unit(s), the date that the modification or reconstruction occurred, and the applicable PTI No. in Part F.

E4. Review the emission units identified in your existing ROP and the emission units that are actually at the stationary source. If an emission unit has been dismantled or rendered permanently inoperable, select “Yes”. Identify the emission unit(s) and the dismantle date in the comments area or on an AI-001 Form.

**PART F: PERMIT TO INSTALL (PTI) INFORMATION**

Part F is used to identify applicable requirements from a PTI that have not been incorporated into the existing ROP. A PTI may be issued to install/construct a new source of emissions at a stationary source or to modify an existing emission unit at the source (e.g., change existing process restriction, monitoring, etc). Both of these situations need to be addressed in this Part.

F1. Select “Yes” if the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP.

If “Yes” is selected, you must enter the information about the PTI in the table provided (Figure 6). Enter the PTI number, the Emission Unit/Flexible Group ID(s) (e.g., EU-COAT, FG-BOILERS), a description of the emission unit, control device(s) and monitoring device(s), and the date the emission unit was installed, modified, or reconstructed. An administratively complete application must include a copy of any PTIs that were issued and identified in this table. **Incorporate all PTI conditions in the mark-up of the ROP.**

Answer questions F2 to F5 in this part as they pertain to all the emission units and all the applicable requirements associated with the PTI(s) referenced in the table.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. <span style="float: right;"><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</span> If No, go to Part G.			
Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (Include Process Equipment, Control Devices and Monitoring Devices)	Date Emission Unit was Installed/ Modified/ Reconstructed
999-09	EU-WIDGET	Widget making machine with afterburner control; monitoring device is a temperature sensor	8-4-2009
544-99A	EU-BOILER4	Coal fired spreader stoker boiler rated at 150 MMBtu/hr with baghouse control; monitoring devices are COM and bag leak detector	8-5-1999/6-1-2011

Figure 6: Example Table from Part F

F2. Select “Yes” if any of the PTIs listed in the table change, add, or delete terms and conditions in the existing emission units or flexible groups in the ROP. Indicate the changes to the existing conditions where appropriate in the mark-up of the ROP.

F3. Select “Yes” if any of the PTIs listed in the table identify new emission units that need to be incorporated into the ROP and include the new emission unit(s) or flexible group(s) in the mark-up of the existing ROP.

F4. Review the stack/vent requirements associated with each emission unit in the PTI(s) listed in the table. Stacks with applicable requirements (e.g., stack height, diameter restrictions) must be identified in the ROP renewal application. If any stacks with applicable requirements were NOT reported in the source’s previous MAERS report, then select “Yes”. Identify the stacks that were not in MAERS on the MAERS Stack Form (SV-101), which can be accessed at <http://michigan.gov/air> (select the “Emissions” Tab, then “Forms & Documents”).

F5. Select “Yes” if you want to propose to change the name of an emission unit, the description of an emission unit, or the control devices in a PTI listed above for an emission unit not already incorporated into the ROP. For example, if a coating operation is identified as EU-COAT1 in the issued PTI, the source can propose to change the name to EU-TOPCOAT before it is incorporated into the ROP. If you select “Yes”, describe the proposed changes on an AI-001 Form. NOTE: administrative changes to emission units already in the ROP can be made under Part H.

**PART G: EMISSION UNITS MEETING THE CRITERIA OF RULE 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290**

The purpose of this part of the application form is to identify new and existing emission units which do not already appear in the existing ROP and which meet the criteria of Rule 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290 of the Michigan Air Pollution Control Rules. These rules exempt specific sources of air emissions from obtaining a PTI but they must be included in the ROP because they have specific applicable requirements associated with them. If a source has an emission unit that falls under one of these PTI exemptions there may be a table in the ROP that specifically addresses these units (Figure 7). If not, a table will be added by AQD staff to incorporate these rule requirements into the renewal ROP.

FG-COLD CLEANERS FLEXIBLE GROUP CONDITIONS
<b>DESCRIPTION</b>
Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278, 278a and Rule 281(2)(h) or Rule 285(2)(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.
Emission Unit: EU-COLDCLNR

Figure 7: Flexible Group Table in ROP for Rule 281(2)(h) exempt cold cleaners

- **Rule 281(2)(h) or Rule 285(2)(r)(iv)** exempts certain cleaning operations that is exempt from the requirement to obtain a Permit to Install.
- **Rule 287(2)(c)** exempts certain coating lines from the requirement to obtain a Permit to Install.
- **Rule 290** exempts emission units with limited emissions from the requirement to obtain a Permit to Install.

G1. Select “Yes” if the source has any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290 and complete the table provided.

If you have installed or removed an emission unit that meets the criteria of one of these rules and your existing ROP already includes a requirement table that pertains to the rule (Figure 7) you should identify how many of the units were added or removed along with the other information in the table under Emission Unit Description (Figure 8). If there is not a Flexible Group in the existing ROP that pertains to the rule and you installed an emission unit that was exempt under one of these rules, you must identify the emission unit in the table in this part. Enter the emission unit ID, descriptions of the process equipment, the control device, and the monitoring device, and the date of installation/modification/reconstruction. If several emission units were installed under the same rule, provide a description of each and an installation/modification/reconstruction date for each (see Figure 8).

*Note: If several emission units have been installed under the same exemption, provide a description of each and an installation/modification/reconstruction date for each.*

Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and a description of Process Equipment, Control Devices and Monitoring Devices	Date Emission Unit was Installed/ Modified/ Reconstructed
<input checked="" type="checkbox"/> Rule 281(2)(h) or 285(2)(r)(iv) cleaning operation	EU-COLDCLEANER Degreaser located in the repair shop. Control and monitoring device - limiting the air/vapor interface to less than 10 square feet	7-15-2008
<input checked="" type="checkbox"/> Rule 287(2)(c) surface coating line	EU-TOUCHUP Spray booth used for repair painting, located in the repair shop. Dry filter control, pressure drop monitor  EU-FINISH Spray booth located in NW corner of production room #4. Dry filter control, pressure drop monitor	8-1-2009  5-26-2010

Figure 8 – Example Table from Part G

## PART H: REQUIREMENTS FOR ADDITION OR CHANGE

### Overview

This part of the application form is used to propose changes, (including additions and/or deletions) to your existing ROP. It is expected that most existing applicable requirements will be kept as they were written in the original document from which they were created (i.e., existing ROP or PTI). However, certain situations may exist in which an applicable requirement may need to be added, including adding new applicable requirements from state or federal regulations that the source is, or will be, subject to and must be incorporated into the ROP. This may include newly promulgated Maximum Achievable Control Technology (MACT) standards. It could also include other proposed changes to the existing ROP such as creating or modifying flexible groups in the existing ROP, making administrative revisions that do not require a PTI, ROP modification applications not yet acted on by the AQD, and any other requirements not previously identified in other parts of the form.

Part H is designed to capture the information necessary for changing, adding or deleting applicable requirements. In this part the source will identify that a change needs to be made, the emission units or flexible group the change affects, the high-level citation for any regulations that need to be incorporated, and the justification for the specific change. The applicant needs to identify the specific change, addition, or deletion on the mark-up of the existing ROP where appropriate

**Do not include additions or changes that have already been identified in Parts F or G of the application form.** For example, if you obtained a PTI to make changes and that PTI is referenced in Part F of the application, you do not need to include the requirements here. Also, if you installed an emission unit that meets the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290, it should be included in Part G, not here.

*Complete a separate Part H for each emission unit with proposed additions and/or changes.*

### Instructions

H1. Select “Yes” if there are any changes being proposed to what is currently in the existing ROP that have not already been identified in Parts F or G of this application. This may include the incorporation of requirements from a new regulation, minor text changes, or modifying language in a condition of the ROP.

If “Yes”, continue to answer the questions in Part H. If “No”, you do not have to complete the rest of this Part since no changes are being proposed.

H2. Select “Yes” if you want to propose a change to the name of an emission unit, the description of an emission unit, or the control devices in your existing ROP. For example, a coating operation is currently called EU-COATER1 in the ROP and you would like to change the name to EU-TOPCOAT. The process (emission unit) is the same and you just want to change the identifier used in the ROP. If you select “Yes”, identify the proposed changes in questions H8 – H16 as applicable, and in the Emission Unit Table in the mark-up of the ROP. If you make a change to the control device, associated monitoring, recordkeeping and/or testing special conditions may also need to be changed.

H3. Select “Yes” if you are proposing to create a new emission unit(s) or flexible group(s) that is not already identified in Parts F or G of the application. Add the emission unit/flexible group to the Emission Unit Summary Table in the mark-up of the ROP. The ID used to identify the emission unit or flexible group must begin with an “EU” or “FG” prefix plus any combination of up to 14 letters, numbers, or keyboard characters. Spaces are not allowed within the ID names. Make the ID specific and easy to associate with the emission unit or flexible group it represents

(e.g. EUPAINTBOOTHs, FGBOILERS). If you already established an ID in MAERS, the same ID should be used in this application. A description of the process, control device(s) and monitoring device(s) must contain sufficient detail to clearly identify the equipment, control device(s), monitoring device(s) and material/fuel used.

All applicable requirements for the emission unit must be described in questions H8 – H16 on the application form and incorporated in a new emission unit table. Blank emission unit tables and AQD template tables for certain MACT and NSPS requirements can be accessed at the following link: <http://michigan.gov/air> (select the Permits Tab, “Renewable Operating Permits (ROP)/Title V, then “ROP Forms & Templates”).

- H4. Select “Yes” if you are adding new state or federal regulations to the existing ROP. This can include formerly exempt equipment that has become subject to an area source MACT. Identify on an AI-001 Form the emission unit(s)/flexible group(s) that the proposed new regulation affects. Identify each state or federal regulation that should be added. For example, if you are proposing to add the requirements from a new federal standard enter the citation: (e.g., FG-COATING is subject to 40 CFR Part 63, Subpart Mmmm).

### Applicable Requirement Templates

The EGLE has developed several templates that may be used to incorporate the applicable requirements from various standards. These templates can be found at <http://michigan.gov/air> (select the Permits Tab, “Renewable Operating Permits (ROP)/Title V”, then “ROP Forms & Templates”). Download the template and make the necessary revisions to it. The template should be included as part of the mark up of your existing ROP. Even if using a template, answer the questions in H8-H16 and provide justification.

For example, if emission units at your facility have recently become subject to a MACT, you can download the MACT template, select the appropriate conditions from the template, and include the template as part of your ROP application. Complete Part H of the application to indicate that you propose to add the requirements from the standard in question H4.

- H5. Some sources are subject to consent orders or consent judgments (CO/CJ) that contain applicable requirements, which may not have been incorporated into the existing ROP. If an applicable requirement is included in a CO/CJ, the citation will be identified in parenthesis in the ROP immediately after the condition. Select “Yes” if the source was issued a CO/CJ and it has not been incorporated into the ROP and the applicable requirements will apply after the ROP is renewed. If “Yes”, enter the CO/CJ number in the space provided, then add or change the special conditions and underlying applicable requirements in the appropriate EU/FG Tables in the mark-up of the ROP.

Answer “Yes” to H5 only if the source is subject to a CO/CJ that contains requirements that are **NOT** cited in the existing ROP.

- H6. Source-Wide requirements must be included in the ROP application package. These are any applicable requirements that apply to the entire stationary source. For example, a synthetic minor Hazardous Air Pollutant (HAP) emission limit and associated recordkeeping that applies to the entire stationary source would be a Source-Wide requirement. Source-Wide applicable requirements do not require the creation of an emission unit or flexible group. However, each Source-Wide requirement that is added, changed or deleted must be identified in question H6.

H7. Select “Yes” if you are proposing to streamline any requirements.

If you are proposing that a requirement be streamlined, you must provide the EU ID, identify the associated conditions (streamlined and subsumed) as well as the applicable requirements associated with those conditions, and a justification pursuant to Rule 212(5) as to why you are proposing the streamlining. Additional information necessary to complete an explanation for streamlining requirements may be included in the space provided. If additional space is needed for a complete explanation of the request, complete and attach an AI-001 Form.

For more information on streamlining requirements, refer to the General Instructions and the *Guidance on Streamlined/Subsumed Requirements in ROPs*, which is found in the ROP Manual at the following link: <http://michigan.gov/air> (select the Permits Tab, “Renewable Operating Permits (ROP)/Title V”, scroll down to Program Support Information & Background, then “ROP Manual”)

### Questions H8 to H16

The ROP application package must contain sufficient information to determine all applicable requirements that the source is subject to. Sources must not only identify the applicable requirement but also provide justification as to why they are subject to the particular requirement. Questions H8 – H16 are used to justify proposed additions, changes, or deletions to the specific applicable requirement types found in the ROP (e.g., emission limits, material limits, process/operational restrictions, etc.) Limited space is provided in these fields because the justification provided should be concise. An AI-001 Form may be used if additional space for a given justification is necessary. *Complete a separate Part H for each emission unit with proposed additions and/or changes.*

It is important to note that special conditions in the ROP that have a footnote 1 or 2 were established through a Permit to Install and may require the source to obtain a new Permit to Install to change or delete the condition. Check with your AQD District Office if you have any questions about a footnoted special condition.

In the field provided, enter the justification for making the change to the special condition and/or underlying applicable requirement in that particular requirement section. In these fields the source will explain “why” the special condition (and/or the underlying applicable requirement) should be added, changed, or deleted.

In question H8, the emission limit section, the source is requesting to remove a sulfur dioxide emission limit established under Rule 402 for a grandfathered boiler, EUBOILER. The justification is that EUBOILER only burns natural gas (although the boiler has burned both fuels in the past). (See Figure 9)

H8. Does the source propose to add, change and/or delete <b>emission limit</b> requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
EU-BOILER - Remove Special Condition I.1, SO <sub>2</sub> emission limit. Boiler will no longer be burning coal.		

Figure 9: Question H8 Example

As a result of the request in question H8, the source also is requesting a change in the operational parameters (question H10), adding a special condition limiting operation of the boiler to fire only natural gas. (See Figure 10)

H10. Does the source propose to add, change and/or delete <b>process/operational restriction</b> requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EU-BOILER - Add a Special Condition III.2. to only allow natural gas to be burned in the boiler.

Figure 10 – Question H10 Example

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 in the existing ROP, unincorporated PTI, or other regulations, does not have an associated monitoring, testing, recordkeeping and/or reporting requirement, then compliance demonstration requirements must be proposed by the applicant.

If multiple options to demonstrate compliance exist, it should be clear in your justification which option(s) have been chosen to comply with the applicable standard or rule and why.

If a new or different monitoring/recordkeeping method (H13) is being proposed, the source will need to include justification related to why that monitoring option is being included and for which limit or restriction it demonstrates compliance. In the example below (Figure 11), the source recently installed a Continuous Opacity Monitor (COM) and proposes to change a monitoring condition from Method 9 readings to using the COM to determine compliance with an opacity limit for the emission unit.

H13. Does the source propose to add, change and/or delete <b>monitoring/recordkeeping</b> requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EU-WIDGERMAKER - Change Special Condition VI.4. from daily Method 9 readings to use of a COM. This monitoring condition is used to show compliance with the 10% visible emission limit in Special Condition I.3.

Figure 11: Question H13 Example

H17. A source may propose Alternative Operating Scenarios or Intra-Facility Emission Trading in their ROP application.

Alternative Operating Scenario Proposals: Pursuant to [Rule 213\(8\)](#), the ROP application package may be used to propose terms and conditions for an alternative operating scenario. The justification for each request must also be included on Part H of the ROP Renewal Application Form. If additional space is needed for a complete explanation of the request, complete and attach an AI-001 Form.

Intra-Facility Emission Trading Proposals: Pursuant to [Rule 213\(9\)](#), the ROP application package may be used to propose terms and conditions for the trading of emissions increases and decreases among process and process equipment within the stationary source solely for the purposes of complying with an emissions cap that is established in the ROP independent of otherwise applicable requirements. The justification for each request must also be included on Part H of the ROP Renewal Application Form. If additional space is needed for a complete explanation of the request, complete and attach an AI-001 Form.

## THE ADDITIONAL INFORMATION FORM (AI-001)

The Additional Information Form, AI-001, is used to submit information or attachments to supplement the specific information requested in the application. In several places throughout the application form you may be asked to submit an AI-001 Form to provide further details about your answer to a particular question. The AI-001 Form may include a narrative description and any other information that the applicant feels is necessary to supplement the specific information requested.

### Completion Instructions

After each part of the ROP application form, there is a box that asks if an AI-001 Form is attached to provide more information for that part. If you are completing an AI-001 Form for that part, you should check the box where indicated and include the AI-001 Form ID you created on the corresponding AI-001 Form (Figure 12). This will help the permit reviewer to locate the AI-001 Form that supplements that part of the application.

<input checked="" type="checkbox"/> Check here if an AI-001 Form is attached to provide more information for Part C. Enter AI-001 Form ID: <b>AI-PARTC</b>
--

Figure 12: AI-001 Form Check Box

1. **Operator’s Additional Information ID:** Enter a unique ID for this Additional Information Form. The ID should correlate to the Part of the application it is supplementing (e.g. AI-PARTB, AI-PART-E).
2. **Is This Information Confidential?:** Only certain information can be kept confidential (see below). If the information meets the criteria to be considered confidential then it must be submitted in a sealed envelope stamped CONFIDENTIAL and labeled with the SRN, Source/Section Name, and ROP Section Number. Any information submitted as confidential must also be submitted by the applicant directly to the USEPA at: United States Environmental Protection Agency, Region 5, 77 West Jackson Blvd., Chicago, IL 60604. Select “Yes” if the information you wish to add as supplemental is considered confidential. In the narrative area of the form DO NOT include the confidential information, but rather enter the following text “Confidential Data has been submitted in a separate envelope that is marked ‘CONFIDENTIAL’.”

#### Confidential Information

Section 5516(3) of Act 451 provides for information submitted in a permit application to be kept confidential, upon request by the applicant. The information that is to remain confidential must be a trade secret or secret process, or production, commercial, or financial information which would jeopardize the competitive position of the applicant upon disclosure. This type of information can be kept confidential and will not be available for review by the general public. However, if a request for public records is made under Section 5 of the Freedom of Information Act, Act No. 422 of the Public Acts of 1976, Section 15.235 of the Michigan Compiled Laws, the department shall notify the applicant of such request. The applicant has 25 days after receipt of notice to demonstrate that the confidential information should not be disclosed. Data on the quantity, composition, or quality of emissions from any stationary source cannot be kept confidential and shall be made available to the public.

Refer to [AQD-010 – Procedures for Handling of Confidential Materials and Freedom of Information Requests for Confidential Material](#) for details. This can be accessed on the internet at: <http://michigan.gov/air> (at the bottom of the page, click on “EGLE Policies” under EGLE Regulations)



**Narrative:** Provide a description of the additional information or attachments in this field. If you want to add supplemental information on different topics, be sure to separate the different topics using spaces, numbers, or titles. You may refer to other documents in this field which have already been prepared (e.g., compliance plans, site diagrams, stack layouts, calculations). In addition, if the information you wish to include was already entered onto a different AI-001 Form, you can simply refer to the other AI-001 Form instead of re-entering it onto this form. Although you have unlimited space to write your narrative electronically, when you print this form it may be broken into several pages.

Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division



**RENEWABLE OPERATING PERMIT APPLICATION  
AI-001: ADDITIONAL INFORMATION**

This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P. A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.

	SRN: Z9999	Section Number (if applicable):
1. Additional Information ID <b>AI-PARTC</b>		
<b>Additional Information</b>		
2. Is This Information Confidential?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>Question C7. EUBOILER1 and EUBOILER2 are both subject to CSAPR</p> <p>Question C8. EUBOILER1 and EUBOILER2 are both subject to Acid Rain</p> <p>Question C9. EUBOILER1 and EUBOILER2 are both subject to CAM</p>		
Page 1 of 1		

For Assistance  
Contact: 800-662-9278

www.michigan.gov/egle  
EQP5774 (Rev 4-22-2019)

*Figure 13 – Example AI-001 Form*

## ROP MARK-UP INSTRUCTIONS

An administratively complete ROP renewal application must also include a mark-up version of the source's existing ROP. The mark-up of the existing ROP allows the source to show what changes they propose to make on the actual ROP document. The mark-up must be completed electronically on the official Microsoft Word version of the ROP from the AQD website. If the official version of the ROP is not used, the mark-up provided will be returned and the applicant will be directed to use the official version on the AQD website. This allows the AQD to protect the integrity of the ROP document. This section of the instructions provides guidance on how to appropriately markup the existing ROP document.

### INSTRUCTIONS

#### **Step 1: Download a Microsoft Word version of the source's existing ROP.**

The AQD's official Word version of the ROP must be used. This document is password protected to ensure all changes are tracked. It can be accessed at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Source List and Permit Documents").

- **Note: All changes must be made and saved in the AQD's official Microsoft Word version of the ROP.**

#### **Step 2: Make appropriate changes.**

Identify where changes should be made to the existing document. These changes should have been identified in the various parts of the application form as explained previously in these instructions (see "Format for Mark-up Changes" below). The "Track Changes" feature in the Microsoft Word version of the existing ROP will automatically be enabled and password protected. All changes to the ROP document will be displayed and reviewable. (See Helpful Hints for the ROP Mark-up in Figure 14 below.)

#### **Step 3: Save the Mark-up document.**

Rename the document as "[your SRN]\_ROP\_MARK-UP" (e.g., "Z9999\_ROP\_MARK-UP").

#### **Step 4: Print a Mark-up copy.**

This should be included in the hard copy version of the ROP renewal application package that will be submitted to the AQD along with the electronic version. (See Helpful Hints for the ROP Mark-up in Figure 14 below.)

## Helpful Hints for the ROP Mark-up

If several people within your company have marked up the ROP with changes and/or comments, you may wish to start over with a clean copy to submit with your application after all changes and/or comments have been decided on.

If too many mark-ups are distracting for you when working in the permit, you may wish to change your view in the tracking toolbar by clicking on the drop-down arrow by the “All Markup” box and change that to “No Markup”. This will hide all the changes. However, if you change this, remember to change it back to “All Markup” before printing your hard copy to submit to the AQD.

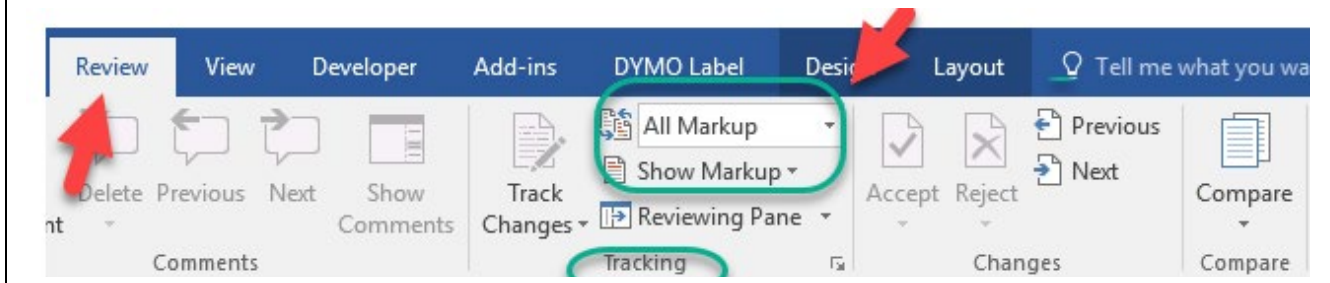


Figure 14: Helpful Hints for the ROP Mark-up

## FORMAT FOR MARK-UP CHANGES

At a minimum, each added/changed condition should include the proposed rule text followed by the underlying applicable requirement(s) (UAR) reference in parenthesis. The UAR is the state rule(s) or federal regulation(s) on which the applicable requirement is based. The UAR is typically identified in existing NSR Permits and ROPs. 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)
- Consent Order: Paragraph 5(a)(3), Consent Order AQD No. 35-2011

The applicable requirement may have more than one underlying applicable requirement. Enter all state rules and/or federal regulations that apply.

See Figures 15 and 16 below.

**EMISSION-UNIT-SUMMARY-TABLE¶**

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.¶

Emission-Unit-ID¶	Emission-Unit-Description¶ (Including-Process-Equipment-&-Control-Device(s))¶	Installation¶ Date/¶ Modification-Date¶	Flexible-Group-ID¶
EU-COLDCLNRS¶	Cold-Cleaners-used-in-the-building.¶	11/1989¶	FG-COLDCLEANERS¶
EU-PRINT¶	Printing-processes-utilizing-UV-curing-ink-and-clean-up-using-isopropyl-alcohol-in-the-plant.¶	4/1/1960¶	FG-RULE290¶
EU-EXTRUDER¶	Includes-extruder-used-to-recycle-foam-polystyrene,-both-pre-and-post-consumer.¶	7/1/1990¶	NA¶
<del>EU-BOILER5¶</del> (dismantled-7/28/09-and-replaced-with-EU-BOILER9¶)	<del>Boiler-#5-600-HP-Steam-Boiler-natural-gas-#2-fuel-oil-backup.¶</del>	<del>1/1/1970¶</del>	<del>FG-BOILERS¶</del>
EU-BOILER7¶	Boiler-#7-700-HP-Steam-Boiler-natural-gas-#2-fuel-oil-backup.¶	1/1/1976¶	FG-BOILERS¶
EU-BOILER8¶	Boiler-#8-800-HP-Steam-Boiler-natural-gas-#2-fuel-oil-backup.¶	1/1/1987¶	FG-BOILERS¶
<del>EU-BOILER9¶</del>	<del>Boiler-#9-500-HP-Steam-Boiler-natural-gas-#2-fuel-oil-back-up.¶</del>	¶	<del>FG-BOILERS¶</del>

Figure 15: Mark-up of Emission Unit Summary Table in ROP

**IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate any spray booth portion of FGCOATINGLN unless ~~its respective waterwash the dry filter~~ particulate control is installed and operating in a satisfactory manner.<sup>2</sup> (R 336.1224, R 336.1901, R 336.1910; )
2. The permittee shall not operate any spray booth portion of FGCOATINGLN unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes a minimum VOC capture efficiency of 100 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight), and maintaining a minimum temperature of ~~1400~~ 1500 °F and a minimum retention time of 0.5 seconds.<sup>2</sup> (R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.1910;)
- ~~3.The permittee shall equip and maintain all basecoat and clearcoat spray booth portions of FGCOATINGLN with electrostatic applicators or equivalent technology with comparable transfer efficiency.<sup>2</sup> (R 336.1220, R 336.1702)~~
- ~~4.The permittee shall equip and maintain all electrostatic applicator portions of FGCOATINGLN with a device to prevent electric current from being shut off except by authorized personnel.<sup>2</sup> (R 336.1220, R 336.1702; Consent Order No. 29-2006, Paragraph 10)~~

Figure 16: Mark-up of Requirements in ROP

**What if the source is NOT proposing any changes to the existing ROP?**

Sources that want to keep all conditions as they currently are in the existing ROP and not add, delete, or change any of the existing conditions will still need to create a mark-up version of the ROP as explained in steps 1-4. It is recommended that on the front page of the ROP document, the applicant type “KEEP ALL CONDITIONS – NO CHANGES, ADDITIONS, OR DELETIONS” (Figure 17).

The image shows a screenshot of a document with a light purple border. At the top, a header box contains the text "MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES AND ENERGY" and "AIR QUALITY DIVISION". Below this, the text "KEEP ALL CONDITIONS" and "NO CHANGES, ADDITIONS, OR DELETIONS" is written in blue, underlined font. This is followed by a vertical list of permit details: "EFFECTIVE DATE: August 11, 2019", "ISSUED TO: Sample Corporation", "State Registration Number (SRN): Z9999", and "LOCATED AT: 555 West Main Street, Lansing, Ingham County, Michigan". At the bottom, a box titled "RENEWABLE OPERATING PERMIT" contains the fields "Permit Number: MI-ROP-Z9999-2014" and "Expiration Date:".

Figure 17: No Changes to ROP Mark-up

## SUBMITTING YOUR ROP RENEWAL APPLICATION

As mentioned previously, the ROP application consists of the application form, a mark-up copy of the existing ROP, and any other necessary supplemental data. All information must be submitted for the application to be considered administratively complete. Follow the steps below to submit your application.

### **Step 1: Review application for administrative completeness**

Review all answers to the questions contained in the ROP application form. All questions must be answered unless directed to do otherwise. Be sure that any supplemental information that must be submitted is identified in the table in Part B and included with the application package.

### **Step 2: Print a paper (hard copy) version**

You are required to submit a hard copy of the entire application package. Print the completed application form, a mark-up copy of the ROP (showing the mark ups), and any supplemental data you are submitting (e.g., MAERS forms, PTIs referenced in Part F of the application form, new CO/CJ, etc.).

### **Step 3: Sign Application**

The Responsible Official must sign where indicated in Part B of the ROP application form. The AQD requires that a hard copy with an **original signature** by the Responsible Official be mailed/delivered to the appropriate AQD District Office.

### **Step 4: Send electronic version of ROP Application Package**

Although an electronic version is not required, it is necessary for a 15-day administrative completeness review by the AQD (see "What's Next?" below).

Attach all the files to an e-mail and send them to [EGLE-ROP@michigan.gov](mailto:EGLE-ROP@michigan.gov).

Be sure to include the following text in the subject line of your email:

*"[Your SRN] – ROP Renewal Application"*

The files should be attached in the following order:

- ROP Application Form
- ROP mark-up (Microsoft Word version)
- Supplemental Data
- Plans referenced in the ROP

If you have trouble submitting the documents via e-mail, you can contact your AQD District Office for instructions to post the application on the state's server, or you may copy the files onto a CD or DVD and mail it to the appropriate AQD District Office.

### **Step 5: Mail Hard-Copy of ROP Application Package**

Mail the application package to the appropriate District Office to the attention of the AQD District Supervisor. District Office addresses are provided in Appendix C.

## What's Next?

Upon receipt of the hard copy of your ROP Application Package, the AQD will review it for administrative completeness. If you submit all the necessary files in BOTH electronic and hard copy format, the AQD will review the application within 15 days to determine administrative completeness. If your source submits only a hard copy of the application, the AQD may take up to 60 days to review it for administrative completeness. **Note that the review period begins when the AQD receives the signed, hard copy version of the application, not the electronic version.**

Be sure that your application package is submitted well before the submittal deadline, which is six months prior to the expiration of the permit. When submitting your application, you should consider the time it will take for the AQD to review the application (15 days for electronic and 60 days for hard copy) and any turn-around time that may be needed to fix issues, should the AQD determine that the application is not administratively complete.

## **APPENDIX A ACRONYMS & DEFINITIONS**

### **ACRONYMS**

AQD .....	Air Quality Division (of EGLE)
BACT .....	Best Available Control Technology
CAA .....	Clean Air Act
CAM.....	Compliance Assurance Monitoring
CFC .....	Chlorofluorocarbon
CFR .....	Code of Federal Regulations
CJ .....	Consent Judgment
CO .....	Consent Order
EGLE .....	Michigan Department of Environment, Great Lakes, and Energy
EPA .....	United States Environmental Protection Agency
EU.....	Emission Unit
FG.....	Flexible Group
HAP .....	Hazardous Air Pollutant
MACT .....	Maximum Achievable Control Technology
MAERS.....	Michigan Air Emissions Reporting System
MAP.....	Malfunction Abatement Plan
NAAQS .....	National Ambient Air Quality Standard
NAICS.....	North American Industrial Classification System
NESHAP.....	National Emission Standard for Hazardous Air Pollutant(s)
NREPA .....	Natural Resources and Environmental Protection Act (Public Act 451 of 1994)
NSPS.....	New Source Performance Standard
NSR .....	New Source Review
PSD .....	Prevention of Significant Deterioration
PTE.....	Potential to Emit
PTI.....	Permit to Install
RMP.....	Risk Management Plan
ROP .....	Renewable Operating Permit
SIC.....	Standard Industrial Classification
SRN.....	State Registration Number
VOC.....	Volatile Organic Compound



## APPENDIX A ACRONYMS & DEFINITIONS

### DEFINITIONS

**Actual Emissions:** Amount of air contaminants emitted from a facility or process device over a given period of time, usually expressed as tons of air contaminant emitted per year (tons/yr). Facilities having to apply for an ROP are subject to an annual fee based partly on their actual emissions.

**Air Contaminant:** Defined in [Rule 101\(f\)](#) of the Michigan Air Pollution Control Rules as a dust, fume, gas, mist odor, smoke, vapor or any combination thereof.

**Applicable Requirement:** All federal and state air quality rules, regulations, permits, orders, and judgments that apply to process devices at a facility. *This term is further defined in Rule 101(o) of the Michigan Air Pollution Control Rules.*

**Application Shield:** Defined in [Rule 210\(1\)](#) of the Michigan Air Pollution Control Rules as the ability to operate process and process equipment at a stationary source while a timely and administratively complete application is being reviewed and acted upon by the department. A renewal application is considered timely pursuant to Rule 210(9) and it is considered administratively complete pursuant to Rule 210(2). Failure to provide a timely response to information requests may result in loss of the application shield. Loss of the application shield is grounds for enforcement action pursuant to Rule 210(1).

**Best Available Control Technology (BACT):** An emission limitation based on the maximum degree of emission reductions that can be achieved through the application of available production methods, systems and techniques. Energy costs, environmental and economic impacts, and other factors are also taken into consideration.

**Clean Air Act (CAA):** Amendments to the federal Clean Air Act were signed into law on November 15, 1990. The main points of the amendments include attainment deadlines for non-attainment areas for National Ambient Air Quality Standard (NAAQS) pollutants, guidelines for reduction of motor vehicle emissions, and air toxics that utilize Maximum Achievable Control Technology (MACT) standards. Likewise, plans for reducing acid rain precursors, sulfur oxides (SO<sub>x</sub>) and nitrogen oxides (NO<sub>x</sub>), are outlined. The operating permit program is introduced in Title V, stating that every major pollution source must have an operating permit, renewed every five years, that specifies its compliance requirements. The remaining parts of the Act include enforcement, climatic protection through the phase-out of chlorofluorocarbons (CFCs) and other stratospheric ozone damaging chemicals, and the final part which provides for research programs and monitoring activities.

**Code of Federal Regulations (CFR):** Regulations published by the executive departments and agencies of the federal government. Title 40 of the CFR contains all of the federal rules and regulations relating to protection of the environment.

**Confidential Information:** Specific information identified as confidential in the application which will not be made available to the general public. Information which may be kept confidential is limited. An AI-001 Form must be completed for all confidential information. See [AQD-010– Procedures for Handling of Confidential Materials and Freedom of Information Requests for Confidential Materials](#) for details on what may be kept confidential. Additional instructions concerning confidential information can be found in the instructions for the AI-001 Form.

**Emission Limit:** Restriction on the amount of a particular air contaminant that can be released from an emission unit or facility over a specified time period. Emission limits are commonly expressed as a concentration (grains per dry standard cubic foot) or rate (pounds per hour).

**Emission Thresholds:** Levels of emission rates (pounds/hour or tons/year) above which certain rules or permit requirements apply.

**Emission Unit:** A device or a group of devices that operate together with a dependency between devices. An emission unit contains one or more process devices and zero or more control devices and related stacks. See [AQD-006 – Procedures for Determining Emission Units](#) for additional guidance on determining emission units. *This term is further defined in R 336.1105(b) of the Michigan Air Pollution Control Rules.*

**Facility:** See definition of “stationary source.”

**Grandfathered:** The Michigan Air Pollution Control Rules became effective on August 15, 1967. Therefore, any emission unit constructed after August 15, 1967, would be subject to the regulatory requirements enacted on that date. Emission units installed, modified or reconstructed before August 15, 1967 are not required to apply for a permit to install pursuant to Rule 201. For example, an emission unit installed in January 1965 would be grandfathered from Rule 201 if it was not modified or reconstructed after August 15, 1967. In general, an emission unit is considered to be grandfathered if it was installed, modified or reconstructed prior to the promulgation date of an applicable requirement, unless the applicable requirement applies to existing emission units.

**Hazardous Air Pollutants (HAPs):** Air pollutants that are not covered by ambient air quality standards but which, as defined in the CAA, may reasonably be expected to cause or contribute to irreversible illness or death. The HAPs are defined in Section 112(b) of the CAA and listed in [40 CFR Part 63, Subpart C](#). A complete list of HAPs can be viewed at the USEPA web site <http://epa.gov/ttn/atw/pollsour.html>.

**ID Prefix:** A code created by the AQD for specific types of IDs. The prefix becomes part of the ID and must be included whenever the ID is used. The following is a list of the ID prefixes:

- AI - Additional Information
- EU - Emission Unit (including PTI exempt EU)
- FG – Flexible Group

**Major Source:** Any facility emitting or having the potential to emit 10 tons per year of any hazardous air pollutant (HAP), 25 tons per year of any combination of HAPs, or 100 tons per year of any regulated air contaminant. *This term is further defined in 40 CFR Part 70 – State Operating Permit Programs (70.2 Definitions).*

**Maximum Achievable Control Technology (MACT):** An emission limitation that is equivalent to or more stringent than an emission limitation achieved, in practice, by the best controlled similar affected source. The emission limitation shall reflect the maximum degree of reduction in emissions that the permitting authority determines is achievable by the constructed or reconstructed major source. See the USEPA Unified Air Toxics web site <http://epa.gov/ttn/atw/eparules.html>. See also [AQD-015 – Procedures for Processing Permit Applications Subject to Federal Clean Air Act Section 112\(g\)](#) for additional details regarding case-by-case MACT determinations. The MACT standards are published as National Emission Standard for Hazardous Air Pollutants (NESHAP) in [40 CFR Part 63](#).

**Modification:** Making a physical or operational change in an existing emission unit which will increase the amount of any air contaminant not already allowed to be emitted under the conditions of a current permit or order. Also, a modification cannot result in the emission of any toxic air contaminant into the outer air not previously emitted. An increase in the hours of operation or an increase in the production rate up to the maximum capacity of the process or process equipment shall not be considered to be a change in the method of operation. The exception to this is if the process equipment is subject to enforceable permit conditions or enforceable orders which limit the production rate or the hours of operation; or both, to a level below the proposed increase. *This term is further defined in R 336.1113(e) of the Michigan Air Pollution Control Rules.*

**National Emission Standard for Hazardous Air Pollutants (NESHAP):** Emission standards set by the USEPA for air contaminants not covered by the NAAQS that may cause an increase in death or serious irreversible or incapacitating illness. The NESHAP regulations are promulgated in 40 CFR Parts 61 and 63. The NESHAP regulations promulgated prior to the CAA were published in [40 CFR Part 61](#). The NESHAP regulations promulgated as a result of the CAA are published in [40 CFR Part 63](#).

**New Source Performance Standards (NSPS):** Uniform national USEPA air emissions standards that limit the amount of pollution allowed from specific new sources or from existing sources that have been modified or reconstructed. The purpose of NSPS is for new sources of emissions to emit less pollution than their predecessors. The NSPS regulations are promulgated in [40 CFR Part 60](#).

**New Source Review (NSR) Permit:** A Permit to Install, required by Rule 201, which authorizes the construction, installation, relocation or alteration of any process, fuel-burning, refuse-burning or control equipment in accordance with approved plans and specifications.

**Operator's ID:** A unique ID created by the source to identify and reference information in the application. The Operator's ID consists of a pre-established ID Prefix (e.g., EU, FG, AR, MS and AI) and up to 14 additional alphanumeric characters.

**Permit to install:** Permit issued by the Michigan Department of Environment, Great Lakes, and Energy that authorizes the installation of new equipment or the modification of existing equipment that emits air contaminants. According to [R 336.1201](#) (Rule 201) of the Michigan Air Pollution Control Rules, a person must apply for and receive an approved permit to install before beginning the installation of a process. The purpose of the permit is to ensure that the proposed process will comply with all of the applicable state and federal air quality requirements at the time it begins operation. The process involved in the issuance of the Permit to Install is sometimes referred to as New Source Review (NSR).

**Potential to Emit (PTE):** The maximum capacity of a stationary source to emit an air contaminant under its current physical and operational design. Any physical or operational limit on the capacity of the stationary source to emit an air contaminant (e.g., air pollution control equipment, restrictions on hours of operation, the type or amount of material combusted, stored or processed) shall be treated as part of its design only if such limit, or the effect it would have on emissions, is legally enforceable. For more information about determining potential to emit go to <http://michigan.gov/air> (select the Permits tab, then Air Permitting-Potential to Emit under Air Permitting Assistance). *This term is further defined in [R 336.1116\(m\)](#) of the Michigan Air Pollution Control Rules.*

**Prevention of Significant Deterioration (PSD):** A program that was established in Title I of the CAA and is used in the development of permits for new or modified sources in an area that is already in attainment. The intent of PSD is to prevent an attainment area from becoming a nonattainment area.

**Process device:** Equipment or activity that generates air contaminants, e.g. boiler.

**Reconstruction:** The replacement of components of an existing emission unit so that the fixed capital cost of the new components is more than 50 percent of the fixed capital cost that would be required to construct a comparable new emission unit and so that it is technologically and economically feasible to meet the applicable requirement. *This term is further defined in [R 336.1118\(b\)](#) of the Michigan Air Pollution Control Rules.*

**Regulated Air Contaminant:** Any dust, fume, gas, mist, odor, smoke, vapor, or any combination thereof that is sanctioned under the Michigan Natural Resources and Environmental Protection Act or the Michigan Air Pollution Control Rules.

**Renewable Operating Permit (ROP Title V Permit):** Air emission permit issued under Rules 210 through 218 of the Michigan Air Pollution Control Rules and 40 CFR Part 70.

**Responsible Official:** Defined in [R 336.1118\(j\)](#) of the Michigan Air Pollution Control Rules.

**SIC code:** The Standard Industrial Classification (SIC) code is a numerical indicator of the primary type of activity at a business. For example, 5153 is a grain elevator, 2951 is an asphalt plant, etc. The first two digits indicate the broad category, the second two digits are more industry-specific.

**Source Wide Requirement:** Any applicable requirement that applies to the entire stationary source. For example, a synthetic minor HAP emission limit and associated recordkeeping that applies to the entire stationary source.

**State Registration Number (SRN):** The alphanumeric identifier assigned to a stationary source by the AQD. The SRNs are unique to a source and are comprised of a letter followed by four digits (e.g., A1497). If a source does not have an SRN, leave the SRN blank on all application forms. An SRN will be assigned during the ROP application review.

**Stationary Source:** All buildings, structures, facilities, or installations that emit or have the potential to emit air contaminants, are under the control of the same person, and have the same 2-digit major group code associated with their primary activity (including those with a different 2-digit major group code that support the primary activity). *This term is further defined in R 336.1119(r) of the Michigan Air Pollution Control Rules.* See also [AQD-011 – Stationary Source Determinations](#) for details regarding stationary source determinations.

**Title V:** Refers to Title V of the CAA Amendments of 1990, which established the requirements for the ROP Program.

**Underlying Applicable Requirement (UAR):** The regulatory foundation on which an applicable requirement is based. For example, if an NSR permit contains a condition that limits the sulfur content in fuel oil, the permit condition is an applicable requirement. The underlying basis for creating this condition is Rule 401; therefore, Rule 401 is the underlying applicable requirement.

## **APPENDIX B**

### **The Compliance Assurance Monitoring (CAM) Rule (40 CFR Part 64) and Renewable Operating Permits**

Stationary sources that are required to obtain an ROP may also be required to submit a CAM Plan with either their initial or renewal ROP application. Stationary sources may be subject to the CAM Rule if they are required to obtain an ROP and have an emission unit for which both of the following conditions are met:

- The emission unit uses a control device to achieve compliance with an emission limitation or standard for the applicable pollutant.
- The emission unit has potential pre-control emissions which are over 100 percent of the major source threshold amount (considered to be major under the ROP Program) for the applicable pollutant.

The CAM Plan will generally be submitted with an ROP application on an AI-001 Form. A CAM Plan should be submitted for each pollutant-specific emission unit that is subject to the Rule. However, only one plan is needed if multiple emission units share the same control device for the regulated pollutant or if multiple control devices of similar design and operation for the regulated pollutant share the same emission unit. If periodic monitoring must be added to your existing ROP, you will have to propose the periodic monitoring on Part H of the application. For guidance on preparing a CAM Plan, see “Requirements for CAM Plan Submittals” in the CAM Fact Sheet at <http://michigan.gov/air> (select the Permits Tab, “Renewable Operating Permits (ROP)/Title V”, scroll down to Program Support Information & Background, then “Compliance Assurance Monitoring (CAM) Information” then select “CAM Fact Sheet”).

The general outline of a CAM Plan is:

- I. Background
- II. Monitoring approach
  - A. Indicators
  - B. Indicator Range
- III. Performance criteria
- IV. Justification

Additional information on CAM exemptions and CAM Plan preparation may be obtained on the Internet at: <http://michigan.gov/air> (select the Permits Tab, “Renewable Operating Permits (ROP)/Title V”, scroll down to Program Support Information & Background, then “Compliance Assurance Monitoring (CAM) Information”). Questions concerning CAM may be directed to your AQD District Office (see list in Appendix C).

**APPENDIX C**  
**Air Quality Division District Office Contact Information**

<p><b>Bay City District</b>  (Central East Michigan)  401 Ketchum Street, Suite B Bay  City, MI 48708  989-894-6200 Fax: 989-891-9237</p> <p><i>Counties: Arenac, Bay, Clare, Gladwin, Huron, Iosco, Isabella, Midland, Ogemaw, Saginaw, Sanilac, and Tuscola</i></p>	<p><b>Cadillac District</b>  (Northwest Lower Peninsula)  120 W Chapin Street  Cadillac, MI 49601  231-775-3960 Fax: 231-775-4050</p> <p><i>Counties: Benzie, Grand Traverse, Kalkaska, Lake, Leelanau, Manistee, Mason, Missaukee, Osceola, and Wexford</i></p>
<p><b>Detroit District</b>  (Wayne County)  Cadillac Place, Suite 2-300  3058 West Grand Blvd.  Detroit, MI 48202  313-456-4700 Fax: 313-456-4692</p> <p><i>Counties: Wayne</i></p>	<p><b>Gaylord District</b>  (Northeast Lower Peninsula)  2100 West M-32  Gaylord, MI 49735  989-731-4920 Fax: 989-731-6181</p> <p><i>Counties: Alcona, Alpena, Antrim, Charlevoix, Cheboygan, Crawford, Emmet, Montmorency, Oscoda, Otsego, Presque Isle, and Roscommon</i></p>
<p><b>Grand Rapids District</b>  (Central West Michigan)  350 Ottawa Avenue NW, Unit 10  Grand Rapids, MI 49503  616-356-0500 Fax: 616-356-0201</p> <p><i>Counties: Barry, Ionia, Kent, Mecosta, Montcalm, Muskegon, Newaygo, Oceana, and Ottawa</i></p>	<p><b>Jackson District</b>  (South Central Michigan)  State Office Building, 4th Floor  301 E Louis B Glick Highway  Jackson, MI 49201  517-780-7690 Fax: 517-780-7855</p> <p><i>Counties: Hillsdale, Jackson, Lenawee, Monroe, and Washtenaw</i></p>
<p><b>Kalamazoo District</b>  (Southwest Michigan)  7953 Adobe Road  Kalamazoo, MI 49009  269-567-3500 Fax: 269-567-3555</p> <p><i>Counties: Allegan, Berrien, Branch, Calhoun, Cass, Kalamazoo, St. Joseph, and Van Buren</i></p>	<p><b>Lansing District</b>  (Central Michigan)  P.O. Box 30242  Constitution Hall, 525 W. Allegan St., 1 South  Lansing, MI 48909  517-284-6651 Fax: 517-241-3571</p> <p><i>Counties: Clinton, Eaton, Genesee, Gratiot, Ingham, Lapeer, Livingston, and Shiawassee</i></p>
<p><b>Marquette District</b>  (Entire Upper Peninsula)  1504 West Washington Street  Marquette, MI 49855  906-228-4853 Fax: 906-228-4940</p> <p><i>Counties: All counties in the Upper Peninsula</i></p>	<p><b>Warren District</b>  (Southeast Michigan)  27700 Donald Court  Warren, MI 48092  586-753-3700 Fax: 586-753-3731</p> <p><i>Counties: Macomb, Oakland, and St. Clair</i></p>