



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

# **RENEWABLE OPERATING PERMIT**

## **INITIAL APPLICATION INSTRUCTIONS**

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# GENERAL INSTRUCTIONS

## INTRODUCTION

This guide has been designed to help you complete and submit an administratively complete initial Renewable Operating Permit (ROP) application. The guide provides instructions for completing the three (3) components of the initial ROP application, which includes the ROP Initial Application Forms, all active Permits to Install issued to the source, 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

Title V of the Clean Air Act Amendments of 1990 requires each state to develop a permitting program for all major sources of air contaminants. Federal rules provide guidance to the states on establishing Title V programs. Michigan incorporated the Title V requirements 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. The ROP Initial Application Forms were 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 (PTIs) and all other applicable air pollution control 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 permits or 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 of 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 <http://michigan.gov/air> (click on 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. 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 criteria pollutant 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 NSPS or Area Source 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 APPLICATION REQUIREMENTS

Each ROP is issued for a fixed term of not more than five years. The ROP application must be submitted in a timely manner. According to Rule 210(6) of the Michigan Air Pollution Control Rules, an administratively complete application for an initial ROP must be received by the AQD not more than **12 months** after the stationary source becomes a major source. This means that you have a 12-month window in which you may submit your ROP application. **DO NOT** wait until the deadline to submit your ROP application. Take into consideration that your ROP application could be returned to you if it does not contain sufficient information and is not administratively complete. It is typically best to submit the application **well** before the deadline. That way, there should be plenty of time to ensure that the application is administratively complete by the deadline.

An administratively complete ROP application must contain, at a minimum, the information listed in [Section 5507\(f\)](#) of Act 451, some 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 initial application shall include three components:

1. The completed ROP Initial Application Forms
2. All active PTIs for the source
3. Supplemental information (e.g., required air emissions data not currently reported using the Michigan Air Emissions Reporting System (MAERS), Plans referenced in PTIs, Consent Orders, etc.). The ROP Initial Application Forms (ASC-001 Form) will help you identify if any supplemental information should be submitted as part of your application.

The ROP initial 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 application package submittal pursuant to Rule 210 is the day the **hard copy** of the application is received at the appropriate AQD District Office. The AQD will determine administrative completeness for an ROP application through a screening process. If the ROP 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." An application is considered timely pursuant to Rule 210(6)-(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 Initial Application may need be completed for each section.** See the SI-001 Form Instructions for more information.

### **STREAMLINED CONDITIONS**

A source may propose in its ROP application to streamline more than one applicable requirement into a single permit condition. The overall objective would be to establish the most stringent permit condition that will assure compliance with all related applicable requirements for an emission unit or flexible group so as to eliminate redundant or conflicting requirements.

If you believe that you have requirements that can be streamlined into a single permit condition, please review 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")

## GETTING STARTED

### Where Do I Start?

Completing an ROP 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 application.

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

Contact your AQD facility contact to discuss your plans to submit an ROP application 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 work on your application, gather all the information you need. Some of the items that may be required include:

- The ROP Initial Application Forms. The forms can be accessed at <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").
- Copies of any PTIs that have been issued to the source. Electronic versions 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, contact your AQD District Office to obtain a Microsoft Word version.
- Consent Orders/Consent Judgments.
- Most recent MAERS submittal to identify emission units. This can be found at <http://maers.state.mi.us/facility/Pages/Main/Login.aspx>
- MAERS forms (Emissions, Stack, etc.) as needed. The forms can be accessed at <http://michigan.gov/air> (select the Emissions Tab, then "Forms & Documents").
- NSPS/MACT Templates and Emission Unit/Flexible Group Templates as needed. The templates 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 PTIs**

Review your existing PTIs and compare the permitted equipment addressed in the PTIs to what is currently at your facility. Does everything match up? If you have installed or removed emission units and your existing PTIs do not reflect these changes, you will need to address those changes in your ROP application. **If any PTI requires modification due to changes at the facility, submit a PTI application as soon as possible to address these changes.**

You will need to enter information about your existing PTIs into the application form. Other equipment at your facility that is not included in a PTI may or may not have to be included in the ROP application depending on the applicable requirements that apply to the equipment.

Note any equipment that is in your PTIs but no longer in operation at your facility, either because it was removed or rendered permanently inoperable. Do not include this equipment in your ROP application and request to have the PTI voided if appropriate.

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

Is your source subject, or will it become subject, to any new state or federal regulations during the term of the ROP (e.g., a new Maximum Achievable Control Technology (MACT) standard)? If so, are the requirements included in an existing PTI? If you are subject to new requirements, 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 must identify the regulation and corresponding requirements in your ROP application. 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 a Consent Order/Consent Judgment, it will contain requirements which must be included with your ROP 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 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, permits for 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 <http://michigan.gov/air> (select the Permits Tab, then “Air Quality Division Permits”).

# ROP INITIAL APPLICATION FORMS INSTRUCTIONS

The ROP Initial Application Forms have been designed to help you complete and submit an administratively complete Initial ROP Application. The forms 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 forms you will also need to submit all active PTIs and any other required supplemental information that is identified in the application forms. Applicants should contact their AQD District Office for assistance when needed.

## Overview

The ROP Initial Application includes the following forms:

- ASC-001: Application Submittal and Certification
- SI-001: Section Information
- S-001: Stationary Source Information
- S-002: Contact and Responsible Official Information
- S-003: Source Requirement Information
- EU-001: PTI Exempt Emission Units
- EU-002: Emission Units Meeting the Criteria of Rule 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290
- EU-003: Emission Units with Permits to Install
- EU-004: Other Emission Units
- FG-001: Flexible Groups
- AR-001: Applicable Requirements from MACT, NESHAP or NSPS
- AR-002: Other Applicable Requirements
- AR-003: Source-Wide Applicable Requirements
- AI-001: Additional Information

Each of these forms collects information necessary for your application to be administratively complete. Be sure to fill in all information and answer all questions unless specifically directed to do otherwise.

## Additional Information Form

An Additional Information Form (AI-001) may be used to supplement any of the information required on the application forms. A box appears at the end of most forms in the application 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 form in the application. For example, if you are supplementing information on the S-002 and AR-001 Forms, you will complete one AI-001 Form for the S-002 Form and one AI-001 Form for the AR-001 Form.



## ASC-001 FORM: APPLICATION SUBMITTAL AND CERTIFICATION

This form is used to identify the items that are included as part of your administratively complete application and to certify your application. You should wait until you have completed the rest of the application before completing this form. Use this form as a checklist to verify that all required components of your application are included.

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

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

### Listing of ROP Application Contents

Listing of ROP Application Contents. See the initial application instructions for guidance regarding which forms and attachments are required for your source. Check the box for the items included with your application.	
<input type="checkbox"/> Completed ROP Initial Application Forms (required)	<input type="checkbox"/> Copies of all Consent Orders/Consent Judgments
<input type="checkbox"/> MAERS Forms (to report emissions not previously submitted)	<input type="checkbox"/> Compliance Plan/Schedule of Compliance
<input type="checkbox"/> HAP/Criteria Pollutant Potential to Emit Calculations	<input type="checkbox"/> Acid Rain Initial Permit Application
<input type="checkbox"/> Stack information	<input type="checkbox"/> Cross-State Air Pollution Rule (CSAPR) Information
<input type="checkbox"/> Copies of all active Permit(s) to Install (required)	<input type="checkbox"/> Additional Information (AI-001) Forms
<input type="checkbox"/> Compliance Assurance Monitoring (CAM) Plan	<input type="checkbox"/> Paper copy of all documentation provided (required)
<input type="checkbox"/> Other Plans (e.g., Malfunction Abatement, Fugitive Dust, Operation and Maintenance, etc.)	<input type="checkbox"/> Electronic documents provided (optional)
<input type="checkbox"/> Confidential Information	<input type="checkbox"/> Other, explain:

*Figure 1: Example of ROP Application Contents from ASC-001 Form*

Identify the necessary items that are being submitted as part of your ROP application (Figure 1). For your application to be complete it must include all active PTIs and all supplemental documentation required as a part of the initial application package. Not all of the items on this list are applicable to all sources. 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 PTI 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 is or expects to be out of

Note that the method or methods used to determine compliance for each applicable requirement must be the method(s) specified in the Permits to Install and all other applicable requirements.

compliance on an AI-001 Form. Provide a compliance plan and schedule of compliance, as defined in Rule 103(dd) and Rule 119(a) on an AI-001 Form.

- 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.

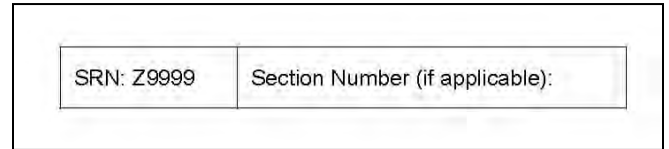
The hard copy of the initial ROP application form sent to the AQD must have an original signature.

If the ROP has more than one section and different Responsible Officials for each section, a separate ASC-001 Form must be submitted for each section.

## SI-001 FORM: SECTION INFORMATION

Section Information Form SI-001 must be completed for all initial ROP applications that have more than one section.

If the source has determined that the ROP should have more than one section, a separate initial ROP Application **may** need to be completed for each section (e.g., if there are multiple owners for the stationary source or a different responsible official). You do not have to complete this form if you have determined that your ROP does not need to be sectioned.



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

**SRN:** Enter the State Registration Number assigned to the source.

**Section Number:** Provide the number for this Section. In the upper right corner of the application forms there is a field to identify the corresponding section number (Figure 2). If you have more than one section, be sure to complete this box.

### Section Information

**Section Name:** Choose and provide a specific name that identifies the Section of the application (e.g., building name, division, physical location within the source).

**Section Description:** Provide a description of the Section, such as the type of operation performed or the product produced. Also include the address for the physical location of the Section if different from source address information listed on the S-001 Form.

**Emission Units Included In This Section:** Provide the ID for every Emission Unit that is part of this Section. Emission Unit IDs are typically found in your PTI. If the Emission Units are not contained in a PTI, choose a descriptive name.

**Additional Information:** Check the box if there is additional information related to this form included on an AI-001 form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.

## S-001 FORM: STATIONARY SOURCE INFORMATION

This form collects basic information about the facility including source location and owner information.

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable).

### **Source Information**

**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 <https://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>.

**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.

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.

## S-002 FORM: CONTACT AND RESPONSIBLE OFFICIAL INFORMATION

This form collects basic information about the contact person at the facility and the Responsible Official.

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

### **Contact Information**

The contact is the person the AQD will contact if they have questions about the initial ROP application. At least one contact for the source must be identified.

**Contact Name:** Enter the name and title of the contact person at the facility.

**Company Name & Mailing Address:** If the contact person's address is identical to the source address entered on the S-001 Form, check the box as indicated in this field. If the contact person's company name and address is different than the source address, complete these fields.

**Phone Number and E-mail Address:** Enter telephone number and e-mail address for the contact person.

### **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. At least one Responsible Official for the source must be identified.

**Responsible Official Name:** Enter the name and title of the Responsible Official.

**Company Name & Mailing Address:** If the Responsible Official's address is identical to the source address entered on the S-001 Form, check the box as indicated in this field. If the Responsible Official's company name and/or address is/are different than the source address, complete these fields.

**Phone Number and E-mail Address:** Enter telephone number and e-mail address for the Responsible Official.

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.

## S-003 FORM: SOURCE REQUIREMENT INFORMATION

The questions on this form pertain to specific requirements or programs to which the source may be subject.

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

### Source Requirement Information

1. [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 PTIs and other equipment that may not be subject to permitting requirements (e.g., exempt or 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").

2. 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*)
3. a. 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](#).  
b. 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, 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>.

4. Select "Yes" if the source belongs to one of the categories listed in Rule 116(n) and 40 CFR 70.2, which require the source to include fugitive emissions in determining the potential to emit (PTE) of the source. If "Yes" is selected, list the source category on an AI-001 Form and include all fugitive emissions when determining the PTE of the source.
5. Select "Yes" if the source has the PTE of criteria pollutants, regulated by the federal Clean Air Act, Section 111, at levels equal to or greater than 100 tons per year for a single criteria pollutant. The PTE Workbook provides guidance in determining your potential to emit. If "Yes" is selected, provide emission calculations for all criteria pollutants that the source emits with a PTE of equal to or greater than 100 tons per year on an AI-001 Form. The PTE Workbook can be found at <http://michigan.gov/air> (select the Permits Tab, then "Air Permitting – Potential to Emit" under Air Permitting Assistance).
6. Select "Yes" if the source emits any hazardous air pollutants (HAPs) regulated by the federal Clean Air Act, Section 112. If "Yes" is selected, provide emission calculations for potential **and** actual emissions of HAPs on an AI-001 Form. 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.
7. 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"). 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 above website.
  - a. Select "Yes" if the source has any emission units subject to the CAM requirements contained in [40 CFR Part 64](#), and identify the emission units and the pollutants that are subject to CAM on an AI-001 Form.
  - b. Also select "Yes" to indicate that a CAM plan is being submitted with the ROP application.
8. Select "Yes" if the source has any active Consent Orders/Consent Judgments (CO/CJ) with either the AQD or EPA. If "Yes" is selected, attach a copy of each active CO/CJ on an AI-001 Form.

9. 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>.
10. a. 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.
  - b. If "Yes" is selected, you will need to submit the Acid Rain Permit application with your ROP application. If you are including these application forms, check "Yes" 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)").
11. 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 identified in an existing PTI requirement, or required by other applicable requirements, such as a federal NESHAPS/MACT/NSPS. If "Yes" is selected, you will need to include the plan(s) as part of the ROP application.

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.



## EU-001 FORM: PERMIT TO INSTALL (PTI) EXEMPT EMISSION UNITS

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

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

**If an emission unit is listed under Rule 212 but has applicable requirements, it must be included in the ROP Initial Application Forms on the EU-002 Form, EU-003 Form, or EU-004 Form.** For example, emission units exempt from PTI under Rule 287(2)(c) should not be listed on an EU-001 Form since they have applicable requirements that need to be included in the ROP and are included on the EU-002 Form. If the source already has an emission unit/flexible group table in an existing PTI, this emission unit/flexible group will be captured under the EU-003 Form of the application. Otherwise, it should be included on an EU-004 Form.

**Question:**

1. Select “Yes”, if the source has any emission units that are required to be listed in the ROP application under Rule 212(4) of the Michigan Air Pollution Control Rules. Identify the emission units that are listed in Rule 212(4) as shown in Figure 3 below.

Select “No” if there are no emission units that are listed in Rule 212(4) and go to the EU-002 Form.

**Identify Exempt Emission Units** (see Figure 3):

**Emission Unit ID:** Create and enter a unique Emission Unit ID.

**Emission Unit Description:** Describe the Emission Unit and any heat inputs, capacities, etc. that are relevant to the exemption rules.

**PTI Exemption Rule Citation:** Identify the PTI exemption rule for the listed Emission Unit.

**Rule 212(4) Citation:** Rule 212(4) identifies certain exempt emission units that need only be listed in an ROP application but are not included in the ROP. Identify the appropriate citation and list the subrule.

<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 3: Example from EU-001 Form*

**Comments:** If needed, use this area to include brief explanations regarding the emission units listed on this form.

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.

**EU-002 FORM: EMISSION UNITS MEETING THE CRITERIA OF RULES 281(2)(h), 285(2)(r)(iv), 287(2)(c), OR 290**

The purpose of this form is to identify new and existing emission units 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, they need to be identified in the ROP application. A table will be added by AQD staff to incorporate these rule requirements into the final ROP.

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

**Question:**

1. Select "Yes" if the source has any emission units which meet the criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290 and complete the table provided.

- **Rule 281(2)(h) or Rule 285(2)(r)(iv)** exempts certain cleaning operations 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.

**Identify Exempt Emission Units** (see Figure 4)

**Origin of Applicable Requirements:** Select the Exemption Rule that applies to the Emission Unit.

**Emission Unit Description:** Create and enter a unique Emission Unit ID and describe the emission unit, any control device and any monitoring device.

**Installation Date(s):** Enter the date that the Emission Unit(s) was/were installed.

Note: If several emission units were installed under the same exemption, provide a description and an installation date for each individual unit as shown below in Figure 4, even if they are in a flexible group.

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	7/25/2008
<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
<input type="checkbox"/> Rule 290 process with limited emissions		

Figure 4: Example from EU-002 Form

**Comments:** If needed, use this area to include brief explanations regarding the emission units listed on this form.

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.

## EU-003 FORM: EMISSION UNITS WITH PERMITS TO INSTALL

The EU-003 Form is used to identify emission units with PTIs that must be incorporated into the ROP.

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

### Identify Permitted Emission Units (see Figure 5)

**Permit to Install Number:** Enter the number of the PTI that contains the Emission Unit.

**Emission Unit ID:** Enter the Emission Unit ID identified in the PTI (e.g., EU-COAT, EU-GAS BOILER). Do not enter the Flexible Group ID.

**Description:** Describe the emission unit, control device(s) and any monitoring device(s).

**Date of Installation/Modification/Reconstruction:** Enter the date the Emission Unit was installed (and modified or reconstructed, if applicable).

An administratively complete application **MUST** include a copy of any PTIs that were issued to the source and identified on the EU-003 Form.

Permit to Install Number	Emission Unit ID	Description (Include Process Equipment, Control Devices and Monitoring Devices)	Date Emission Unit was Installed/ Modified/ Reconstructed
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	8-5-1996/6-1-2010
999-09	EU-WIDGET	Widget making machine with afterburner control; monitoring device is a temperature monitor	8-4-2010

*Figure 5: Example from EU-003 Form*

### Questions:

1. Some sources may want to make changes to emission unit names and descriptions contained in the PTI since it was issued. Select “Yes” if you propose to change the name of an emission unit, the description of an emission unit, or the control devices in the PTI(s) referenced in the table. 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.
2. If there are conditions in the PTI that are confusing or unclear, you can propose clarifications to the condition, as long as the proposed change does not make the condition less stringent. If you would like to propose any clarifications, select “Yes” and provide a description of the proposed changes on an AI-001 Form.
3. The ROP program requires a method to determine compliance with every limit and operational restriction. This is accomplished through monitoring, testing, recordkeeping and/or reporting requirements. If the PTI does not contain monitoring and/or recordkeeping requirements to demonstrate compliance with applicable requirements such as emission or material limits, you

must propose monitoring and/or recordkeeping for those applicable requirements. Select "Yes" and propose the appropriate monitoring and/or recordkeeping on an AI-001 Form.

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.

## EU-004: OTHER EMISSION UNITS

Complete an EU-004 Form for any emission unit that has **not** been addressed on an EU-001, EU-002, or EU-003 Form. This would include grandfathered or exempt emission units that have applicable requirements in the AQD Rules or are subject to a MACT, NESHAPS, NSPS or other federal requirement.

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

**Question:**

1. Select "Yes" if you have any emission units that have not been addressed on the previous EU Forms (see description above). Make additional copies of the form if needed.

**Identify Other Emission Units** (see Figure 6)

**Emission Unit ID:** Enter the ID assigned to the Emission Unit.

**Installation Date:** Enter the date the Emission Unit was installed.

**Modification/Reconstruction Date(s):** Enter the date of the last modification or reconstruction (if applicable).

**SIC Code:** Include **ONLY** if it is different than the SIC Code entered on the S-001 Form for the source.

**Emission Unit Description:** Enter a description of the Emission Unit, control device(s), and any monitoring device(s). Also, list the AR Form that is used to describe the applicable requirements of the AQD Rule or federal regulation that applies to the Emission Unit.

Emission Unit ID	Installation Date (MM/DD/YYYY)	Modification/Reconstruction Date(s) (MM/DD/YYYY)	SIC Code – <i>If different from S-001 Form</i>
EU-BOILER	10-15-1955		
Emission Unit Description – <i>Include process equipment, control devices, monitoring devices, and all stacks/vents associated with this emission unit that have applicable requirements. Indicate which forms are used to describe/include the applicable requirements for this emission unit (AR-001 and/or AR-002 Forms).</i>			
250 MMBtu spreader stoker coal fired boiler with baghouse control. Monitoring device is a pressure drop monitor. An AR-001 Form is used to describe the requirements for the Area Source Boiler MACT - 40 CFR Part 63, Subpart JJJJJ			

*Figure 6: Example from EU-004 Form*

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.

## FG-001 FORM: FLEXIBLE GROUPS

The FG-001 Form may be completed to define any group that is created for simplification of assigning regulations (stack parameters, emission limits, opacity limits, operational parameters) or for reasonable anticipated operational scenarios pursuant to Rule 213(8). Flexible groups may include emission units that have identical applicable requirements for controls, monitoring, etc. Any emission unit listed in a flexible group must be previously identified on the appropriate emission unit form. Flexible groups created as part of an ROP can be created by the stationary source or the AQD and are fixed for the term of the permit.

Examples of flexible groups include:

- Multiple coating lines with one emission limit, or multiple lines each with the same limit. The lines would also have the same method of complying with the emission limit and the same testing and reporting requirements.
- Multiple automotive plastic parts coating lines, all subject to Rule 632.
- Multiple emission units which exhaust to one control device, and have the same emission limits, testing requirements, and monitoring as a result.
- Three natural gas boilers, each with a heat input of less than 100 million Btu/hr subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc.
- Multiple trichloroethylene solvent cleaning tanks subject to the National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Part 63, Subpart T.
- Two diesel fired emergency engines subject to the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63, Subpart ZZZZ

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

### **Identify Flexible Groups**

**Flexible Group ID:** Create and enter a Flexible Group ID.

**Flexible Group Description:** Provide a description of the Flexible Group.

**Emission Unit IDs:** List the IDs of the Emission Units to be included in the Flexible Group.

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.



## AR-001 FORM: APPLICABLE REQUIREMENTS FROM MACT, NESHAP or NSPS

This form is used to identify any emission units that are subject to a federal MACT, NESHAP or NSPS.

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

### Question:

1. Select "Yes" if you have any emission units at your source that are subject to a MACT, NESHAP, or NSPS regulation.

### **Identify Applicable Requirements for Emission Units** (See Figure 7)

Enter information for **each** emission unit that is subject to one of the listed regulations as shown in the example below (Figure 7). You may group emission units that are subject to the same regulation. DO NOT list flexible groups – list each emission unit in the flexible group. Use additional copies of the form if needed.

**MACT, NESHAP or NSPS Subpart and Name:** Identify the specific MACT, NESHAP, or NSPS that applies to the emission unit(s).

**Emission Unit ID:** Provide the Emission Unit ID that was created on the EU-003 or EU-004 Form.

**Applicable Requirements Attached:** Identify the appropriate format for incorporating the applicable requirements (PTI, a Template Table created by the AQD if available, or a newly created ROP table) and attach it to the application. An administratively complete application **must** include a copy of any Emission Unit Tables or PTIs that are identified on the AR-001 Form.

In the example below, the source has three paint booths that are subject to a MACT, and an existing MACT Template Table created by the AQD is being used to incorporate the requirements into their ROP. They also have an emission unit subject to an NSPS, with the requirements already included in a PTI. NOTE: If a PTI only has a high-level citation for the applicable regulation, a newly created table with the detailed applicable requirements must be submitted. Finally, they have another emission unit subject to an NSPS, and are using a blank EU Table to include the requirements. Each Table or PTI needs to be included with the application. Refer to the following link for blank EU Tables, as well as MACT and NSPS Template Tables: <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

MACT NESHAP or NSPS Subpart and Name	Emission Unit ID – Provide the Emission Unit ID you created on the EU-003 or EU-004 Form	Applicable Requirements Attached in Which Format?
40 CFR Part 63, Subpart PPPP – Surface Coating of Plastic Parts and Products	EU-PAINT1, EU-PAINT2, EU-PAINT3	<input type="checkbox"/> PTI No. <input checked="" type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**
40 CFR Part 60, Subpart EE – Surface Coating of Metal Furniture	EU-FURNCOAT	<input checked="" type="checkbox"/> PTI No. 158-90 <input type="checkbox"/> Template Table* <input type="checkbox"/> Newly Created Table**
40 CFR Part 60, Subpart GG – Stationary Gas Turbines	EU-TURBINE	<input type="checkbox"/> PTI No. <input type="checkbox"/> Template Table* <input checked="" type="checkbox"/> Newly Created Table**

Figure 7: Example Table – Applicable Requirements from MACT, NESHAP, NSPS

**Streamlined Requirements:**

2. Select “Yes” if you are proposing to streamline any requirements, and identify the streamlined and subsumed requirements and provide the EU ID and the justification for streamlining the applicable requirement on 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”)

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.

## AR-002: OTHER APPLICABLE REQUIREMENTS

The questions on this form are used to identify applicable requirements for Emission Units listed on the EU-004 Form and the methods used to demonstrate compliance. Generally, the applicable requirements that will be identified on this form will come from state rules, consent orders/consent judgments, or federal regulations (other than those from a MACT, NESHAP or NSPS included on the AR-001 Form).

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

You should complete a separate AR-002 Form for each Emission Unit listed on the EU-004 Form.

### Identify Applicable Requirements

For questions 1 – 8 on this form, determine if each Emission Unit identified on the EU-004 Form has any applicable requirements in the listed categories that originate in state rules, consent orders/consent judgments, or federal regulations (other than MACT, NESHAP or NSPS requirements included on the AR-001 Form). If they do, enter the EU ID and the source of the applicable requirement in the space provided. Also, create an ROP table for the Emission Unit using a blank EU Template Table and enter the applicable requirement(s) in the appropriate section.

In the examples that follow, the source has a grandfathered coal-fired boiler with baghouse control that is listed on the EU-004 Form.

1. Is there an emission unit identified on an EU-004 Form that is subject to <b>emission limit(s)</b> ? If <u>Yes</u> , fill out an EU table to identify the emission limit(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EU-BOILER Particulate emission limit (Rule 331, Table 31) Visible emission limit (Rule 301) Sulfur dioxide emission limit (Rule 401)	

Figure 8: Example Question 1 from AR-002 Form

The source marked “yes” on question 1, as EU-BOILER is subject to particulate emission limit, visible emission limit and sulfur dioxide emission limit in the Michigan AQD Rules.

2. Is there an emission unit identified on an EU-004 Form that is subject to <b>material limit(s)</b> ? If <u>Yes</u> , fill out an EU table to identify the material limit(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Figure 9: Example Question 2 from AR-002 Form

The source marked “no” on question 2, as EU-BOILER has no material limits that apply from state or federal regulations.

3. Is there an emission unit identified on an EU-004 Form that is subject to <b>process/operational restriction(s)</b> ? If <u>Yes</u> , fill out an EU table to identify the process/operational restriction(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EU-BOILER Proper operation of air cleaning device (Rule 910)	

Figure 10: Example Question 3 from AR-002 Form

The source marked “yes” on question 3, as the baghouse on EU-BOILER is subject to Michigan AQD Rule 910.

4. Is there an emission unit identified on an EU-004 Form that is subject to <b>design/equipment parameter(s)</b> ? If <u>Yes</u> , fill out an EU table to identify the design/equipment parameter(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Figure 11: Example Question 4 from AR-002 Form

The source marked “no” on question 4, as EU-BOILER has no design/equipment parameters that apply from state or federal regulations.

5. Is there an emission unit identified on an EU-004 Form that is subject to <b>testing/sampling requirement(s)</b> ? If <u>Yes</u> , fill out an EU table to identify the testing/sampling requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EU-BOILER Sample/analyze coal for sulfur content or sulfur dioxide equivalent emission rate (Rule 401)	

Figure 12: Example Question 5 from AR-002 Form

The source marked “yes” on question 5, as EU-BOILER has requirements for sampling the sulfur content of the coal in Michigan AQD Rule 401.

6. Is there an emission unit identified on an EU-004 Form that is subject to <b>monitoring/recordkeeping requirement(s)</b> ? If <u>Yes</u> , fill out an EU table to identify the monitoring/recordkeeping requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EU-BOILER Keep daily records of sulfur content of fuel (Rule 401)	

Figure 13: Example Question 6 from AR-002 Form

The source marked “yes” on question 6, as EU-BOILER has requirements to keep records of the sulfur content of the fuel in Michigan AQD Rule 401.

7. Is there an emission unit identified on an EU-004 Form that is subject to <b>reporting requirement(s)</b> ? If <u>Yes</u> , fill out an EU table to identify reporting requirement(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EU-BOILER Submit records of sulfur content of fuel upon request (Rule 401)	

Figure 14: Example Question 7 from AR-002 Form

The source marked “no” on question 7, as EU-BOILER has no reporting requirements that apply from state or federal regulations.

8. Is there an emission unit identified on an EU-004 Form that is subject to <b>stack/vent restriction(s)</b> ? If <u>Yes</u> , fill out an EU table to identify stack/vent restriction(s), and provide the EU ID and the source of the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Figure 15: Example Question 8 from AR-002 Form

The source marked “no” on question 8, as EU-BOILER has no stack/vent restrictions that apply from state or federal regulations.

The ROP program requires a method to determine compliance with each and **every emission limit, visible emission limit, material limit, and operational restriction**. This is accomplished through monitoring, testing, recordkeeping and/or reporting requirements. If a limit or restriction from state rules, consent orders/consent judgments, or a federal regulation does not have an associated monitoring, testing, recordkeeping and/or reporting requirement already included in questions 5 - 7, then compliance demonstration requirements must be proposed. Any requirements that are being **proposed** should be entered under question 9 on the AR-002 Form.

The visible emission and particulate emission limits for EU-BOILER in example question 1 (Figure 8) do not have associated methods to determine compliance in the Michigan AQD Rules, so the methods of compliance must be proposed in question 9 of the AR-002 Form. Justification must be provided as to why that method of compliance is being included and for which limit or restriction it demonstrates compliance (Figure 16). The monitoring, recordkeeping, testing and reporting requirements will also have to be entered in the appropriate sections in the ROP Table that is created for EU-BOILER.

9. Are there any other requirements that you would like to <b>add</b> for an emission unit identified on an EU-004 Form? If <u>Yes</u> , fill out an EU table to identify the requirements, and provide the EU ID and a justification for the applicable requirement below. Do not include requirements identified on an AR-001 Form.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
EU-BOILER Add stack testing every five years to show compliance with the particulate emission limit (Rule 213(3)) Add daily Method 9 VE readings to show compliance with the visible emission limit (Rule 213(3)) Add daily monitoring of pressure drop across the baghouse to show ongoing compliance with the particulate emission limit and proper operation of the baghouse (Rule 213(3))	

Figure 16: Example Question 9 from AR-002 Form

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.

On question 10, select “Yes” if you are proposing to streamline any requirements, and identify the streamlined and subsumed requirements and provide the EU ID and the justification for streamlining the applicable requirement on 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”)

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.

## AR-003: SOURCE-WIDE APPLICABLE REQUIREMENTS

All Source-Wide requirements must be included in the ROP application. These are any applicable requirements that apply to the entire stationary source. An example would be a synthetic minor Hazardous Air Pollutant (HAP) emission limit and associated recordkeeping that applies to the entire stationary source.

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

### Question:

1. Select "Yes" if there are any applicable requirements that apply to your entire source.

### Identify Source-Wide Applicable Requirements

Use a blank Source-Wide Table to list all Source-Wide conditions from a PTI along with the applicable requirement(s) associated with each condition.

A blank template Source-Wide Table is available at: <http://michigan.gov/air> (select the Permits Tab, "Renewable Operating Permits (ROP)/Title V", then "ROP Forms & Templates").

NOTE: Source-Wide requirements that are contained in a PTI will be included in a table named "FG-FACILITY." This table will become the Source-Wide Table in your ROP.

### Comments Field

Create conditions for applicable requirements that apply to the entire source for which a condition does not already exist.

Enter these conditions in the comments field on the AR-003 Form, and include the applicable requirement that you believe is appropriate for that condition.

**Additional Information:** Check the box if additional information related to this form is included on an AI-001 Form and create an ID for the AI-001 Form. Refer to the AI-001 Form instructions.

## AI-001: ADDITIONAL INFORMATION FORM

The Additional Information Form, AI-001, is used to submit information or attachments to supplement the specific information requested in the application. The AI-001 Form may include a narrative description and any other information that the applicant feels is necessary to supplement the information requested.

At the end of each form in the ROP application, there is a box that asks if an AI-001 Form is attached to provide more information for that form (Figure 17). If you are completing an AI-001 Form to supplement that specific form, you should check the box where indicated and include the AI-001 Form ID you created. This will help the permit reviewer to locate the AI-001 Form that supplements that particular form.

Check if an AI-001 Form is attached to provide more information for S-003. Enter AI-001 Form ID: AI-S-003

Figure 17: Example AI-001 check box at bottom of ROP Forms

**SRN:** Enter the State Registration Number assigned to the source

**Section Number:** Provide the number for this Section (if applicable)

### Provide the Following Information:

- 1. Additional Information ID: Create** and enter a unique ID for this Additional Information Form. The ID should correlate to the specific Form in the application that it is supplementing (e.g., AI-S-003 Form, AI-AR-002 Form).
- 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



**3. Narrative:** Provide a description of the additional information or attachments in this field. If you want to add supplemental information on different topics, 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 on 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-S-003 Form</b>		
<b>Additional Information</b>		
2. Is This Information Confidential? <span style="float: right;"><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</span>		
Question #7. Emission Units subject to CAM: EU-WDGETPROCESS Pollutant: particulate matter		
Question #10a.: Emission Units subject to Acid Rain -EU-BOILER4		

Figure 18: Example AI-001 Form

## SUBMITTING YOUR INITIAL ROP APPLICATION

As mentioned previously, the ROP application consists of the application forms, copies of all active PTIs, 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 forms. 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 on the ASC-001 Form 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 forms, and make sure you have copies of all active PTIs and any supplemental data you are submitting (e.g., MAERS forms, plans such as MAPs, fugitive dust, any active CO/CJ, Acid Rain Permit application, etc.). Compile the forms in the order listed on page 8 of these instructions, followed by any supplemental information not associated with an AI-001 Form.

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

The Responsible Official must sign where indicated on the ASC-001 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] – Initial ROP Application"*

The files should be attached in the following order:

- ROP Application Forms (in the order listed on page 8)
- Active PTIs
- 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 you submit 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 not more than twelve months after the stationary source commences operation as a major source. 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 make corrections or submit more information, 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. An application is considered timely pursuant to Rule 210(4)-(8) 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 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.

**Permit to install:** Permit issued by the Michigan Department of Environmental Quality 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 or 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.

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 49601-2158          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 48202-6058          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 49735-9282          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 49201-1556          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 49009-5026          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 48909-7760          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 48092-2793          586-753-3700 Fax: 586-753-3731</p> <p><i>Counties: Macomb, Oakland, and St. Clair</i></p>