

RENEWABLE OPERATING PERMIT: STAFF REPORT

Pitsch Sanitary Landfill

Staff Report Date: December 23, 2024

State Registration Number (SRN): N5619

Located: 7905 Johnson Road, Belding, Ionia County, Michigan 48809

Renewable Operating Permit Number: ROP0000570 v4.0

Air Quality Division Permit Writer: Chris Robinson, Environmental Quality Analyst
RobinsonC17@Michigan.gov or 616-286-0083

Air Quality Division Decision Maker: Heidi Hollenbach, Grand Rapids District Supervisor

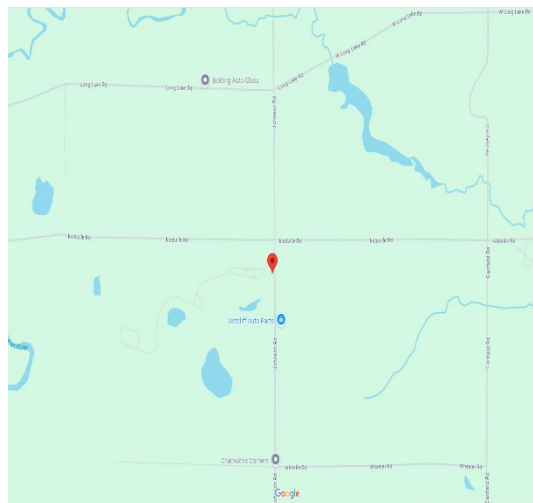


Figure 1: Pitsch Sanitary Landfill Location

Rule 214(1) of the administrative rules promulgated under Section 5506 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a draft permit and a report (Statement of Basis) that sets forth the applicable requirements and factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

As part of [EGLE's Limited English Proficiency Plan](#), an evaluation of the number of people who speak English "less than very well" was conducted within a 1-mile radius of the location using an environmental justice screening tool like the USEPA's EJSCREEN. If additional languages were determined to be required, translation of the public notice will be done into any languages identified during the evaluation. If translation into other languages is needed or if there are other accessibility concerns, requests may be sent to EGLE-Accessibility@Michigan.gov

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Introduction

The Title V operating permit program is a national permitting system required by Title V of the Federal Clean Air Act of 1990, codified in Title 40 of the Code of Federal Regulations (CFR) Part 70, and is administered by each state. In Michigan, these permits are known as a Renewable Operating Permit (ROP). A Renewable Operating Permit or ROP is a specific type of air permit a source must have when emissions of air pollutants are above certain levels.

The ROP is intended to clarify a stationary source's applicable requirements and outlines compliance with them by consolidating all state and federal air quality requirements into one document. An ROP contains more monitoring, testing, recordkeeping, and reporting requirements than a facility with low levels of emissions.

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a Renewable Operating Permit (ROP) pursuant to Title V of the federal Clean Air Act and Michigan's Administrative Rules for Air Pollution Control promulgated under Section 5506 of Act 451. Sources subject to the ROP Program are defined in Rule 211.

An ROP consists of five parts. Part A contains the general conditions. Part B contains special conditions, if any, that apply source wide. Parts C and D contain special conditions for all processes at the stationary source that are subject to process-specific emission limits or standards. Part E lists non-applicable requirements. The ROP also contains eight or more appendices which detail various supplementary information or requirements. The purpose of this staff report is to provide information about the facility, what the facility does, the air quality rules and regulations that apply, compliance status, and the final action taken by EGLE, AQD.

Section 1: General Source Information

Source Description

The Pitsch Sanitary Landfill is a municipal solid waste landfill located in Belding, Ionia County, Michigan. Demolition waste is the primary waste stream disposed of in this landfill. In landfills, natural biological processes produce leachate and landfill gas from the breakdown of waste constituents. Initially, decomposition is aerobic until the oxygen supply is exhausted. Anaerobic decomposition of buried refuse creates most of the landfill gas. Landfill gas (LFG) consists mainly of methane, carbon dioxide, and non-methane organic compounds (NMOCs). The NMOC fraction consists of various organic hazardous air pollutants (HAPs), greenhouse gases, and volatile organic compounds (VOCs).

The Pitsch Sanitary Landfill (Pitsch) began operations in 1975 and currently has a design capacity greater than 2.5 million cubic meters. The facility consists of solid waste disposal Cells 1 through 4 which are capped and closed and Cells 5 through 8 which are permitted and active. There is also a closed Act 87 area that was in operation from 1975 through 1992. Pitsch is not required to operate a gas collection and control system, however, spark flares have been installed on the passive vents to assist in the prevention of offsite odors.

Changes Made to the Source Since the Last Renewal

No changes have been made to the source since the last renewal.

Section 2: Facts and Basis

The following table provides information about the application, facility contacts, and important dates related to the ROP.

ROP Details

North American Industry Classification System (NAICS) code:	562212
NAICS Name:	Solid Waste Landfill
Is Application for an Initial or Renewal Issuance?	Renewal
Application Number:	202400126
Responsible Official:	Gary Pitsch, Vice President
Date Application Received:	August 5, 2024
Date Application Was Administratively Complete:	August 5, 2024
Is Application Shield* in Effect?	Yes
Date Public Comment Begins:	December 23, 2024
Date Public Comment Ends:	January 22, 2025

* An application shield allows a Title V subject source the ability to continue operating until final action is taken on the permit application provided the applicant submitted a timely and administratively complete application and provides timely responses to information requests during the application review.

The following table lists the potential emissions and actual annual emissions of regulated air pollutants as reported to AQD for the year 2023. The source must submit records of actual emissions for the pollutants listed in the table every year.

Total Annual Emissions

Pollutant	Potential Emissions in Tons per Year	Actual Emissions in Tons per Year
Particulate matter (PM) less than or equal to 10 microns in diameter (PM ₁₀)	--	0.17 (Truck Traffic)
VOCs / Non-Methane Organic Compounds (NMOCs)	*NMOC 3.36	NMOC 3.16 (Landfill)

*Estimated by the source for the year 2023 using the Landgem Model, which includes HAP emissions.

This source is an area source of hazardous air pollutant (HAP) emissions as listed pursuant to Section 112(b) of the federal Clean Air Act. No HAP emissions data is listed.

Source-Wide Permit to Install (PTI)

A Permit to Install (PTI) provides permission to a source to install a process and emit air contaminants up to certain specified levels. These levels are set by state and federal laws and regulations to protect health and welfare. By staying within the levels set by a PTI, a stationary source is operating lawfully, and public health and air quality are protected. Michigan's PTI Program includes major and minor New Source Review (NSR) and synthetic minor permitting.

The purpose of the ROP is to consolidate all existing air quality requirements including PTI(s) for a facility into one permit. The ROP conditions will focus on monitoring, testing, recordkeeping and reporting to ensure compliance with limits or restrictions established in PTI(s) or by other applicable air quality requirements.

Michigan Rule 214a requires the issuance of a Source-Wide PTI contained within the same document as the ROP to include all conditions established pursuant to Rule 201 Permits to install. All terms and conditions that are established in a PTI are identified with a footnote designation in the ROP.

The ROP does not contain a Source-Wide PTI pursuant to Rule 214a.

Air Quality Rules and Regulations

This section gives basic information about air quality rules and regulations that apply to the source and are included in the ROP.

Source Type by Pollutant

Pollutant	Title V Major Source	Major NSR Source	Major Nonattainment NSR Source	Synthetic Minor NSR Source	Major HAP Source	Synthetic Minor HAP Source	Area HAP Source
CO							
Lead							
NOx							
PM							
PM10							
PM2.5							
SO ₂							
VOCs / NMOCs	*Yes						
Individual HAP							Yes
Aggregate HAPs							Yes

*The source is subject to 40 CFR Part 60 Subpart WWW and 40 CFR Part 62 Subpart OOO that requires the source to obtain a 40 CFR Part 70 permit, since it has a design capacity greater than 2.5 million megagrams or 2.5 million cubic meters.

The stationary source is an area source of HAP emissions because the potential to emit of any single HAP is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year. HAPs are regulated by Section 112 of the federal Clean Air Act.

No emission units at the stationary source were subject to the Prevention of Significant Deterioration (PSD) regulations of the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air

Quality because at the time of New Source Review (NSR) permitting, the potential to emit of regulated pollutants was less than 250 tons per year.

Federal Requirements Included in the ROP

This section includes federal air regulations that were developed to implement and enforce standards of performance for new stationary sources and for National Emission Standards for Hazardous Air Pollutants (HAPs) that the source is subject to.

EUASBESTOS at the stationary source is subject to the National Emission Standards for Hazardous Air Pollutants for Asbestos promulgated in 40 CFR Part 61, Subparts A and subpart M.

The stationary source was previously subject to the Standards of Performance for Municipal Solid Waste Landfills promulgated in 40 CFR Part 60, Subparts A and WWW. On June 21, 2021, the facility became subject to the Federal Plan Requirements for Municipal Solid Waste Landfills that commenced construction on or before July 17, 2014, and have not been modified or reconstructed since July 17, 2014, as specified in 40 CFR Part 62, Subpart 000. Michigan is not currently the delegated authority of Subpart 000 and is implementing and enforcing this regulation through the ROP.

The stationary source is subject to the National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills as promulgated in 40 CFR Part 63, Subparts A and AAAA.

Acid Rain

The Acid Rain Program (ARP) was the first national cap and trade program in the country, and it introduced a system of allowance trading that requires major emission reductions of SO₂ and NO_x, the primary precursors of acid rain, from the power sector. EGLE, AQD is the authority responsible for issuance of Phase II Acid Rain (Title IV) Permits in Michigan. The Acid Rain Permit and requirements are incorporated into the source's ROP.

No emission units at the stationary source are subject to the federal Acid Rain Program.

Cross-State Air Pollution Rule

This is a federal cap and trade program that addresses air pollution from power plants in upwind states that cross state lines and affects air quality in downwind states. This is done by regulating annual emissions of NO_x and SO₂ as well as NO_x emissions during the ozone season (May 1 through September 30).

No emission units at the stationary source are subject to the Cross-State Air Pollution Rule.

NOx SIP Call

The NO_x SIP Call is a regulatory program initiated by the USEPA in 1998 to address the interstate transport of nitrogen oxides (NO_x), which are precursors to ozone pollution. The program requires states to develop State Implementation Plans (SIPs) that set statewide NO_x budgets for the ozone season, aiming to reduce NO_x emissions and improve air quality.

No emission units at the stationary source are subject to the NO_x SIP Call.

Periodic Monitoring

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

Compliance Assurance Monitoring (CAM)

Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64 is intended to provide a reasonable assurance of compliance with the emission limit(s) for emission units with an air pollution control device. Monitoring is done to show that control devices are properly operated and maintained in order to continuously maintain the control efficiency to meet an emission limit or standard.

No emission units have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring (CAM) rule pursuant to 40 CFR Part 64 because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds. Pre-control emissions were determined through Tier II sampling conducted under 40 CFR Part 60, Subpart WWW.

Streamlined/Subsumed Requirements

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

Processes Not Included in the Draft ROP

The following table identifies activities that need to be listed in an ROP application, however, are considered exempt processes that are not included in the ROP pursuant to Rule 212(4). These processes are not subject to any process-specific emission limits or standards.

Processes not in the ROP

Emission Unit ID	Description of Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EU00013 EU-propane Tank	Propane Tanks used for heating garage and office. Garage 1000 gal. tank, installed 1994; office 500 gal. tank installed 1996	Rule 212(4)(b)	Rule 284(2)(b)
EU00011 EU-Heater	Propane powered radiant heater used in garage. 2 heaters estimated at 80,000 BTU/hour	Rule 212(4)(b)	Rule 282(2)(b)(i)

Draft ROP Terms/Conditions Not Agreed to by Applicant

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by EGLE, AQD

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. All comments received during the public comment period will be considered prior to a decision being made. The delegated decision maker for the AQD is Heidi Hollenbach, Grand Rapids District Supervisor.

The final determination to approve, approve with modifications, or deny the proposed ROP will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

Section 3: Frequently Used State and Federal Regulations

These tables list the most frequently used state and federal air regulations. Not all regulations listed may be applicable in each case. Please refer to the permit conditions to determine which regulations apply.

STATE AIR REGULATIONS

State Rule	Description of State Air Regulations
<u>R 336.1201</u> (Rule 201)	Requires a Permit to Install for new or modified equipment that emits, or could emit, an air pollutant or contaminant. However, there are other rules that allow smaller emission sources to be installed without a permit (see Rule 279 through Rule 291 below). Rule 201 also states that the Department can add conditions to a permit to assure the air laws are met.
<u>R 336.1205</u> (Rule 205)	Outlines the permit conditions that are required by the federal Prevention of Significant Deterioration (PSD) Regulations and/or Section 112 of the federal Clean Air Act. Also, the same types of conditions are added to a permit when a plant is limiting pollutant air emissions to legally avoid these federal requirements. (See the Federal Regulations table for more details on PSD.)
<u>R 336.1210</u> (Rule 210) to <u>R 336.1218</u> (Rule 218)	Rules for the ROP Program including applicability, applications, content, approval, consolidation, modification, renewal, and reopenings.
<u>R 336.1224</u> (Rule 224)	New or modified equipment that emits toxic air contaminants must use the Best Available Control Technology for Toxics (T-BACT). The T-BACT review determines what control technology must be applied to the equipment. A T-BACT review considers energy needs, environmental and economic impacts, and other costs. T-BACT may include a change in the raw materials used, the design of the process, or add-on air pollution control equipment. This rule also includes a list of instances where other regulations apply and T-BACT is not required.
<u>R 336.1225</u> (Rule 225) to <u>R 336.1232</u> (Rule 232)	The ambient air concentration of each toxic air contaminant emitted from the project must not exceed health-based screening levels. Initial Risk Screening Levels (IRSL) apply to cancer-causing effects of air contaminants and Initial Threshold Screening Levels (ITSL) apply to non-cancer effects of air contaminants. These screening levels, designed to protect public health and the environment, are developed by Air Quality Division toxicologists following methods in the rules and the United States Environmental Protection Agency risk assessment guidance.
<u>R 336.1280</u> (Rule 280) to <u>R 336.1291</u> (Rule 291)	These rules list equipment to processes that have very low emissions and do not need to get an Air Use permit. However, these sources must meet all requirements identified in the specific rule and other rules that apply.
<u>R 336.1301</u> (Rule 301)	Limits how air emissions are allowed to look at the end of a stack. The color and intensity of the color of the emissions is called opacity.

STATE AIR REGULATIONS

State Rule	Description of State Air Regulations
R 336.1331 (Rule 331)	The particulate emission limits for certain sources are listed. These limits apply to both new and existing equipment.
R 336.1370 (Rule 370)	Material collected by air pollution control equipment, such as dust, must be disposed of in a manner, which does not cause more air emissions.
R 336.1401 (Rule 401) and R 336.1402 (Rule 402)	Limit the sulfur dioxide emissions from power plants and other fuel burning equipment.
R 336.1601 (Rule 601) to R 336.1651 (Rule 651)	Volatile organic compounds (VOCs) are a group of chemicals found in such things as paint solvents, degreasing materials, and gasoline. VOCs contribute to the formation of smog. The rules set VOC limits or work practice standards for existing equipment. The limits are based upon Reasonably Available Control Technology (RACT). RACT is required for all equipment listed in R 336.1601 through 336.1651.
R 336.1702 (Rule 702)	New equipment that emits VOCs is required to install the Best Available Control Technology (BACT). The technology is reviewed on a case-by-case basis. The VOC limits and/or work practice standards set for a particular piece of new equipment cannot be less restrictive than the Reasonably Available Control Technology (RACT) limits for existing equipment outlined in R 336.1601 through 336.1651.
R 336.1801 (Rule 801)	Nitrogen oxide emission limits for larger boilers and stationary internal combustion engines are listed.
R 336.1901 (Rule 901)	Prohibits the emission of an air contaminant in quantities that cause injurious effects to human health and welfare or prevent the comfortable enjoyment of life and property. As an example, a violation may be cited if excessive amounts of odor emissions were found to be preventing residents from enjoying outdoor activities.
R 336.1902 (Rule 902)	Adopts standards by reference including provisions of 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS); 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP); and 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories for federal air pollutant regulations from stationary sources.
R 336.1910 (Rule 910)	Air pollution control equipment must be installed, maintained, and operated properly.
R 336.1911 (Rule 911)	When requested by the AQD, a facility must develop and submit a malfunction abatement plan (MAP). This plan is to prevent, detect, and correct malfunctions and equipment failures.
R 336.1912 (Rule 912)	A facility is required to notify the AQD if a condition arises which causes emissions that exceed the allowable emission rate in a rule and/or permit.

STATE AIR REGULATIONS

State Rule	Description of State Air Regulations
<u>R 336.2001</u> (Rule 1001) to R 336.2060 (Rule 1060)	Allow the AQD to request that a facility test its emissions and to approve the protocol used for these tests.
<u>R 336.2501</u> (Rule 1501) to R 336.2514 (Rule 1514)	Regulates mercury emissions from any stationary coal-fired electric generating unit (EGU) serving a generator with a nameplate capacity of more than 25 megawatts producing electricity for sale. The program begins January 1, 2015, and contains provisions for existing and new EGUs. Mercury program eligibility provisions and prohibitions, demonstration plans, testing, monitoring, record keeping, and reporting are all part of the rule.
<u>R 336.2801</u> (Rule 1801) to R 336.2804 (Rule 1804) Prevention of Significant Deterioration (PSD) of Air Quality	<p>The PSD rules allow the installation and operation of large, new sources and the modification of existing large sources in areas that are meeting the National Ambient Air Quality Standards (NAAQS). The regulations define what is considered a large or significant source, or modification.</p> <p>In order to assure that the area will continue to meet the NAAQS, the permit applicant must demonstrate that it is installing the Best Available Control Technology (BACT). By law, BACT must consider the economic, environmental, and energy impacts of each installation on a case-by-case basis. As a result, BACT can be different for similar facilities.</p> <p>In a PTI application, the applicant identifies all air pollution control options available, the feasibility of these options, the effectiveness of each option, and why the option proposed represents BACT. As part of its evaluation, the AQD verifies the applicant's determination and reviews BACT determinations made for similar facilities in Michigan and throughout the nation.</p>
<u>R 336.2901</u> (Rule 1901) to R 336.2903 (Rule 1903) and R 336.2908 (Rule 1908) New Source Review for Major Sources Impacting Nonattainment Areas	<p>Applies to new "major stationary sources" and "major modifications" as defined in R 336.2901. These rules contain the permitting requirements for sources located in nonattainment areas that have the potential to emit large amounts of air pollutants. To help the area meet the NAAQS, the applicant must install equipment that achieves the Lowest Achievable Emission Rate (LAER). LAER is the lowest emission rate required by a federal rule, state rule, or by a previously issued construction permit. The applicant must also provide emission offsets, which means the applicant must remove more pollutants from the air than the proposed equipment will emit. This can be done by reducing emissions at other existing facilities.</p> <p>As part of its evaluation, the AQD verifies that no other similar equipment throughout the nation is required to meet a lower emission rate and verifies that proposed emission offsets are permanent and enforceable.</p>

FEDERAL AIR REGULATIONS

Citation	Description of Federal Air Regulations or Requirements
<u>Section 109 of the Clean Air Act</u> - National Ambient Air Quality Standards (NAAQS)	The United States Environmental Protection Agency has set maximum permissible levels for seven pollutants. These NAAQS are designed to protect the public health of everyone, including the most susceptible individuals, children, the elderly, and those with chronic respiratory ailments. The seven pollutants, called the criteria pollutants, are CO, lead, NO _x , ozone, PM ₁₀ , PM _{2.5} , and SO ₂ . Portions of Michigan are currently in nonattainment for either ozone or SO ₂ . Furthermore, in Michigan, State Rules 336.1225 to 336.1232 are used to ensure the public health is protected from other compounds.
<u>40 CFR 51</u> , Appendix S - Emission Offset Interpretive Ruling	Appendix S applies during the interim period between nonattainment designation and EPA approval of a SIP that satisfies nonattainment requirements specified in Part D of the federal Clean Air Act. Appendix S would apply in nonattainment areas where either no nonattainment permit rules apply or where the existing state rules are less stringent than Appendix S.
<u>40 CFR 52.21</u> - Prevention of Significant Deterioration (PSD) Regulations	<p>The PSD regulations allow the installation and operation of large, new sources and the modification of existing large sources in areas that are meeting the NAAQS. The regulations define what is considered a large or significant source, or modification.</p> <p>In order to assure that the area will continue to meet the NAAQS, the permit applicant must demonstrate that it is installing the Best Available Control Technology (BACT). By law, BACT must consider the economic, environmental, and energy impacts of each installation on a case-by-case basis. As a result, BACT can be different for similar facilities.</p> <p>In a PTI application, the applicant identifies all air pollution control options available, the feasibility of these options, the effectiveness of each option, and why the option proposed represents BACT. As part of its evaluation, the AQD verifies the applicant's determination and reviews BACT determinations made for similar facilities in Michigan and throughout the nation.</p>
<u>40 CFR 60</u> - Standards of Performance for New Stationary Sources (NSPS)	The United States Environmental Protection Agency has set national standards for specific sources of pollutants. These New Source Performance Standards (NSPS) apply to new or modified equipment in a particular industrial category. These NSPS set emission limits or work practice standards for over 60 categories of sources.
<u>40 CFR 61</u> - National Emission Standards for Hazardous Air Pollutants (NESHAP)	The United States Environmental Protection Agency has set national standards for specific sources of pollutants. The National Emission Standards for Hazardous Air Pollutants (NESHAP) apply to new or modified equipment in a particular industrial category. These NESHAPs set emission limits or work practice standards for Asbestos, Benzene, Beryllium, Coke Oven Emissions, Inorganic Arsenic, Mercury, Radionuclides, and Vinyl Chloride (originally published listed HAPs) from sources.

FEDERAL AIR REGULATIONS

Citation	Description of Federal Air Regulations or Requirements
<u>40 CFR 62</u> - Approval and Promulgation of State Plans for Designated Facilities and Pollutants	The United States Environmental Protection Agency has set forth the approval and disapproval of State plans for the control of pollutants and facilities under Section 111(d), and Section 129 as applicable, of the federal Clean Air Act, and the promulgation of Federal plans (e.g., 40 CFR 62 - Federal Plan Requirements for Municipal Solid Waste Landfills that commenced construction on or before July 17, 2014 and have not been modified or reconstructed Since July 17, 2014).
<u>40 CFR 63</u> - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories	The United States Environmental Protection Agency has set national standards for specific sources of pollutants. The National Emission Standards for Hazardous Air Pollutants (NESHAP) (a.k.a. Maximum Achievable Control Technology (MACT) standards) apply to new or modified equipment in a particular industrial category. These NESHAPs set emission limits or work practice standards for over 100 categories of sources.
<u>40 CFR 64</u> - Compliance Assurance Monitoring (CAM)	<p>Compliance assurance monitoring (CAM) is intended to provide a reasonable assurance of compliance with applicable requirements under the federal Clean Air Act for large emission units that rely on a pollution control device for compliance. Monitoring is conducted to determine that control devices are properly operated and maintained so that they continue to achieve a level of control that complies with applicable requirements.</p> <p>Stationary sources may be subject to CAM if they are required to obtain an ROP and have an emission unit for which all the following conditions are met: the emission unit uses a control device to achieve compliance with a federally enforceable 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 (at a level considered to be major under the ROP Program) for the applicable pollutant, the emission limitation or standard does not meet a CAM exemption.</p>