

## INSTRUCTIONS FOR USING THE ROP STAFF REPORT TEMPLATE TO CREATE AN ROP STAFF REPORT

The ROP Staff Report is an MS Word Document. Any form fields or brackets/wording in brackets indicate where something needs to be typed in or options chosen. The brackets and any wording within the brackets as well as any red or blue text should be deleted as the staff report document is filled in. Initially, complete the form fields, then “unprotect” the document to work in the remainder of the template.

**NOTE: Text added to the ROP Staff Report should be typed in Arial 11.**

1. Create the ROP Staff Report.
  - a. Open the **ROP Staff Report.dot** template in MS WORD.
  - b. Save the document to the source’s ROP renewal folder on your district’s S drive as **SRN Draft Staff Report {MM-DD-YY}.doc**.
2. **General Information:** Fill in the information from Part A of the ROP Renewal Application, or the S-001 and S-002 Forms in the ROP Initial Application, in the General Information section on page 3 of the Staff Report.
3. **Source Description:** This can be copied and pasted from the previous Staff Report. However, **REVIEW** the description for accuracy and completeness, and update as necessary. This section should adequately describe the source in enough detail (including emission units and controls) that someone unfamiliar with the source will understand the major components of the source and what the source does/manufactures. Be sure to also include topographical information, surrounding land use, monitoring equipment, and other relevant historical information. Any major changes or modifications since the last ROP should be mentioned in this section too. If this is an Initial ROP, start with the source description on the S-001 Form.
4. **Source Emissions:**
  - a. *Criteria pollutants:* Fill in the emissions in the table from the most recent MAERS submittal and include the year of the emissions in the sentence preceding the table.
  - b. *Hazardous Air Pollutants (HAPs):* Include HAP emissions for all sources that are major for HAPs, have taken opt out limits for HAPs or are not otherwise true minor sources of HAPs (e.g., major for VOCs). Use data provided by the company or MAERS AQD generated emissions and enter that information in the table for all HAPs listed that are emitted at 0.1 tons/year or more. In the sentence preceding the table, include the year of the emissions and who calculated them (the company or AQD).
    - i. *If the source is a true minor source for HAPs, remove the HAPs table and include the following sentence:* “This source is a true minor source of HAPs, thus no HAP emissions data is listed.”

**The remainder of the staff report will be a working document. Fill in what you can now, but remember to return to it as you do your technical review of the ROP and determine what regulations apply to the source and/or specific emission units.**

5. **Regulatory Analysis:** **DO NOT** copy and paste this from the previous Staff Report. Language has been updated, additional options may be available, and new standard paragraphs may be required. The previous Staff Report can be used as a guide for determining which items were previously included. If there is any doubt as to which option applies, review necessary records to confirm the correct option. Don’t automatically assume that what was in the previous Staff Report is 100% correct. The options here are **not all inclusive**. There may be additional regulatory information that needs to be described for this specific source. Compare the pollutants listed in the regulatory summary area that make the source major for ROP to the pollutants marked as major in MACES on the regulatory summary screen. These should be the same pollutants.

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- a. **Attainment Status:** Determine if the county is attainment/unclassified for all pollutants or non-attainment for ozone, SO<sub>2</sub>, and/or PM 2.5.
- b. **Subject to Title V (ROP):** Pick the appropriate options and combine to address ALL pollutants for which the source is major and subject to the ROP program. If the source is subject to an Area Source MACT or other federal / state regulations that *require the source to obtain an ROP*, include that information here. If the source is major for criteria pollutants and minor for HAPs, choose the appropriate HAP minor/opt out option and include in the staff report.
- c. **PSD Applicability:** There are four options to choose. Be sure to review the UARs in the Emission Unit Tables for the source to assist in determining PSD applicability. If you have questions, review the permit engineer's notes for the PTIs that the UARs came from, talk with the permit engineer that wrote the permit, with previous inspectors, or your supervisor to help figure out the source's PSD applicability.
- d. **GHG Applicability:** Choose one of the two paragraphs if the source has GHG PSD BACT limits, or has taken synthetic minor limits for GHG to avoid PSD. If the source has no GHG emission limits, do not include either paragraph.
- e. **Non-Attainment NSR and NSR Program Applicability:** Include any of these three (3) paragraphs *if they apply*. The first one addresses major sources in non-attainment areas. The second paragraph addresses grandfathered equipment, and the third, equipment that was exempt from NSR permitting when it was installed.
- f. **Other Items for Regulatory Analysis:** This is a reminder of many of the other items that should be addressed in the Regulatory Analysis area of the Staff Report. Refer to the attached "Supplemental Recommendations for Staff Report" from EPA, Region 5.
  - i. During any PTI review, were issues such as VOC BACT (Rule 702), Part 6 Rules, or Toxics Review under Rules 224/225 involved? A discussion of these or **other significant reviews** should be included here. Review the permit engineer's write up on any significant PTIs that have been issued to the source.
  - ii. Has the source limited its potential to emit? If so, describe the limits and what requirements the source is avoiding; how the limit assures the source stays below the threshold; and how the limit is practically enforceable.
  - iii. Were there any significant changes to the source since the previous ROP was issued? This could include equipment that has been removed, PTIs that have resulted in changes to the ROP through modifications to the existing ROP, or PTIs/modifications that will be dealt with during this renewal. Were new applicable requirements added, or were any removed? Also, any off-permit notifications of new equipment should be discussed here. Include any changes in ownership/source name (even though it's not a regulation, it's a change that should be documented).
  - iv. Review the ROP Application for any other regulations that the source is subject to that are not already addressed with the standard language, and include them here if appropriate. Has exempt equipment become subject to federal or state regulations and therefore need to be included in the ROP? If so, discuss the equipment and the regulation.
  - v. Does the source have unique or unusual monitoring? Did they have a choice of several monitoring options? If so, describe why the monitoring in the ROP was chosen, and what factors were considered (source type, emissions variability, compliance and performance test history, likelihood of noncompliance considering potential to emit, etc.)? If parametric or surrogate monitoring is included in the ROP, include how the monitoring is correlated to emissions.
  - vi. Have there been any significant VNs issued to the source, or escalated enforcement action taken by the state or the EPA? If so, give a brief background as to what the

## INSTRUCTIONS FOR USING THE ROP STAFF REPORT TEMPLATE TO CREATE AN ROP STAFF REPORT

- violation was, the current status, any resulting permanent requirements and the underlying authority for the permanent requirements (i.e. NSR, source specific SIP).
- vii. If the source did not obtain an application shield, discuss the reason why and how the potential loss of the permit shield will be addressed.
- viii. Include any other key issues that the EPA and/or the public need to have information on to understand the rationale behind the decisions.
- g. **NSPS, NESHAP, MACT:** Include the appropriate language for each NSPS, NESHAP and MACT that the source is subject to. Be sure to list *only* the EU/FGs that are subject to the specific regulation.
- h. **Area Source MACT(s):** If the source is subject to an Area Source MACT, use the language for each Area Source MACT that applies. If an AQD ROP template is not available for an applicable Area Source MACT and AQD is not the delegated authority for the Area Source MACT, then the company is required to provide the requirements or special conditions to be included in the ROP. We **do not** review these conditions for accuracy.
- i. **Acid Rain:** Include this language if the source has Emission Units subject to this regulation. The ROP application should indicate if there are EUs subject.
- j. **CSAPR:** This replaces CAIR. Include this language if the source has Emission Units subject to this regulation. The ROP application should indicate if there are EUs subject.
- k. **Enforcement:** Include any pertinent information as it relates to any enforcement action with the company since the last ROP issuance. This should include, but is not limited to, any significant VNs and any escalated enforcement resulting in a Consent Order/Judgment and/or a compliance schedule in Appendix 2. Any ongoing violations should also be included in this section. Describe the background/history of the violation, the current status and expected resolution (if not currently resolved). Also include a description of any violations that resulted in permanent requirements and the underlying authority for the permanent requirements.
- l. **CAM:** There are MANY options to choose from in this category. Refer to the CAM Fact Sheet in the ROP Manual (3.C.2) for additional assistance. **NOTE:** It is important that you review **ALL** Emission Units with emission limits and control devices for that pollutant for CAM applicability. An emission unit (EU) with a low emission limit and high control efficiency may not appear to have potential pre-control emissions over the major source threshold. An EU with a pollutant emission limit of 12 tons per year with control equipment that is 90% efficient would be subject to CAM (potential pre- control emissions of 120 tpy) unless other pre-control emission information is available.
- i. If there are NO emission limits subject to CAM, use the first paragraph and delete the CAM Table at the end of the CAM options. For these emission units with control, briefly describe how potential pre-control emissions were determined.
- ii. If the source has at least one controlled emission unit subject to CAM and has one or more controlled units not subject to CAM due to potential pre-control emissions less than major source levels, use the second paragraph. Fill in the CAM Table and consider the remaining paragraphs.
- iii. If there are emission limits or back-up utility power emission units that are exempt under any of the following options, include the appropriate language in the Staff Report. See ROP Manual (4.F.2) for more information on these exemptions. Please provide more detail to explain the reason for any CAM exempt emission limits. If the source has no other emission limits subject to CAM, delete the CAM Table at the end of the CAM options.
- Emission limit(s) subject to an NSPS or MACT proposed after November 15, 1990
  - Emission limit(s) subject to Acid Rain monitoring requirements

## INSTRUCTIONS FOR USING THE ROP STAFF REPORT TEMPLATE TO CREATE AN ROP STAFF REPORT

- Emission limit(s) subject to Emission Trading (CSAPR)
  - Emission limit(s) subject to a Continuous Compliance Determination Method (e.g., CEMS)
  - Back-up Utility Power Emission Unit
- iv. If there are any emission limits subject to the CAM regulations, fill in the table for each emission limit that is subject to the CAM regulations. The company must have included a CAM plan with their ROP Application to address *each emission limit* listed (unless one was previously submitted, and the company is not proposing any changes).
- v. If the source has proposed Presumptively Acceptable Monitoring (PAM) in the CAM Plan, review the CAM Fact Sheet in the ROP Manual (3.C.2) and further instructions are below in No.5.I.vi, Bullet 7.
- vi. FILLING OUT THE CAM TABLE
- List the Emission Unit/Flexible Group ID in the first column with CAM-subject emission limit(s).
  - Enter each pollutant and corresponding emission limit on a separate line.
  - Enter the UAR(s) for each emission limit in the UAR(s) column.
  - Enter the control equipment associated with the listed pollutant.
  - Provide a brief description of the monitoring chosen to show proper operation of the control equipment and reasonable assurance of compliance with the emission limit; and the reason why it was chosen. Include the monitoring range. Remember, if the pollutant emission limit is >100 tons *after control*, monitoring data *must be* collected at least every 15 minutes and averaged over the applicable averaging period.
  - Enter the Emission Unit/Flexible Group table that contains the CAM monitoring and conditions. In some cases, this may be different from Column 1.
  - If the source has identified Presumptively Acceptable Monitoring (PAM) in the CAM Plan or ROP application, then the proposed monitoring will need to be evaluated to determine that it meets the requirements {see “CAM Fact Sheet” in the ROP Manual (4.F.2)}. If monitoring that meets the requirements of PAM is included in the ROP for CAM monitoring, put “Yes” in the “PAM?” column for that emission unit/flexible group. CAM UAR’s still need to be used for this monitoring in the ROP. CAM template language including reporting will need to be included as well.
- vii. Below the CAM Table, there is space to briefly describe the CAM Monitoring and how it assures compliance. Delete all other CAM paragraphs that are not needed.

**Remember** that even if an emission limit is exempt under one of the exemptions listed above, there may be another emission limit for the same pollutant or a different pollutant with control that will still require a CAM plan to be submitted. If you have any questions, *contact the AQD CAM Specialist* to assist you in making determinations.

6. **Source-Wide PTI:** List **all** PTIs that have previously been incorporated into an ROP (and were listed in Appendix 6 with the last renewal) but **only** those PTIs. Check ROP Look up for a list of PTIs that were incorporated into ROPs. Any PTIs that are being incorporated into this renewal ROP must be listed in Appendix 6 of the ROP and **not** here. For a PTI that does not have an associated ROP Revision application or an ROP application that does not have an associated PTI, enter NA in the appropriate column in the table. If this is an Initial ROP, remove the paragraph and the table.

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7. ***Streamlined/Subsumed Requirements:*** If any streamlined/subsumed requirements have been identified in the technical review of the Working Draft ROP, they should be addressed here. There is alternate language to include if no requirements have been streamlined in the ROP. See “*Staff Guidance on Streamlined-Subsumed Requirements*” in the ROP Manual (3.D) for an example of how to complete the table in the Staff Report if the ROP contains streamlined/subsumed requirements.
8. ***Processes in Application not identified in Draft ROP:*** Review Part D of the Renewal Application, or the EU-001 Form in the Initial Application, and your technical review notes to determine which emission units need to be included in this table and complete the table with that information. Check to make sure the correct PTI exemption rule (these can change with any Part 2 Rules revisions) and Rule 212(4) references are used.
9. ***Draft ROP Terms/Conditions not agreed to by Applicant:*** Leave both options in this area until the official Working Draft ROP has been reviewed by the source and the Draft ROP is being prepared for public comment, and then choose the appropriate option.
10. ***Compliance Status:*** Choose the appropriate option based on the technical review of the ROP application.
11. ***Action taken by EGLE:*** Fill in your district supervisor’s name and your district office in the appropriate spots.

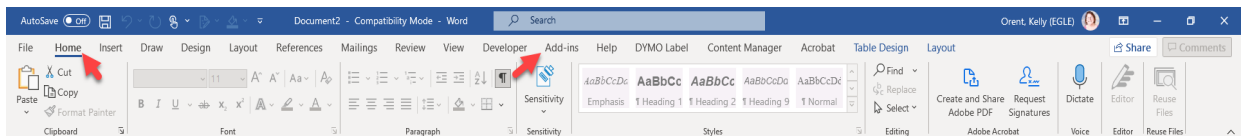
**IMPORTANT:** Verify that all of the important information noted in the technical review has been incorporated into the staff report. This should include **all** modifications to the ROP.

## CREATING THE STAFF REPORT ADDENDUM

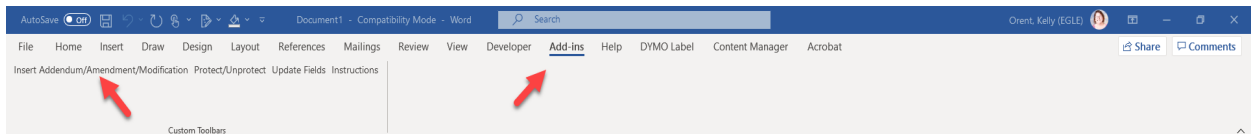
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**NOTE: Text added to the ROP Staff Report Addendum should be typed in Arial 11.**

1. Open the ROP Staff Report.
  - a. On the top ribbon, on the “Home” tab, click on the “Add-In” tab. (If there is no add in tab, you will need to put it back on the ribbon or you will need to open the addendum template and cut and paste it into the staff report. [See "Adding the Add-Ins Tab Instructions."](#))



- b. Click on the “Insert Addendum/Amendment/Modification” tab.



- c. The box below will pop up. Click on “Addendum” radio button, then click “OK.” This will bring the Addendum in to the Staff Report.

A screenshot of the 'Insert Addendum/Amendment/Modification' dialog box. The dialog box has a title bar and two buttons at the top: 'OK' and 'Cancel'. Below the buttons, there is a text area with the instruction: 'To insert an amendment/modification in the staff report, make selection below and click OK.' The dialog box contains several sections with radio buttons for selection. The 'Initial or Renewal Staff Report' section has the 'Addendum' radio button selected. The 'Admin Amend (1)(a)(i)-(iv)' section has the 'Final' radio button selected. The 'Admin Amend (1)(a)(v)' section has the 'Proposed' radio button selected. The 'Minor Modification' section has the 'Proposed' radio button selected. The 'Reopening' section has the 'Draft' radio button selected. The 'Significant Modification' section has the 'Draft' radio button selected. The 'State-Only Modification' section has the 'Final' radio button selected. A red arrow points to the 'Addendum' radio button. At the bottom of the dialog box, there is a note: 'Note: The insertion will occur automatically at the end of the document.'

- d. Fill in all the necessary information.
- e. Save the document to the source's ROP renewal folder on your district's S drive as **SRN Draft Staff Report {MM-DD-YY}.doc**. (This will be the date of the start of the 45-day EPA review.)

## **Additional Addendums**

If EPA comments at 45-day rather than at 30-day, an additional addendum will be needed. Follow the steps above to add the addendum. The new date will be the date of the final ROP.

If comments received at 30-day or 45-day result in significant changes to the ROP, the ROP may need to go through the 30-day public comment period again. An additional addendum will be needed. Follow the steps above to add the addendum.