

**INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT
TO CREATE A RENEWABLE OPERATING PERMIT**

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ROP SHELL

The ROP shell is a 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 should be deleted as the shell document is filled in. Initially, complete the form fields, then “unprotect” the document to work in the remainder of the template. **NOTE: The revision date at the bottom of the cover page is for staff reference only and should be removed before sending the ROP to the company for review.**

Text added to the ROP shell should be typed in Arial 10.

If any management or work practice plans (i.e., MAP, Nuisance Minimization, Fug. Dust, O&M, PMP, SSM, etc.) **are submitted with the application, these should be requirements in special conditions in the ROP.**

Certificate Cover Page

Refer to the Renewable Operating Permit Application Forms for the information required on the cover page (i.e., Owner Name, Source Name, Address, City, State and Zip Code).

- Insert the Owner Name (e.g., General Motors, Ford Motor Co.) under “Issued To:” followed by the Source Name (e.g., BOC, Michigan Truck) if it is different than the Owner Name. The source name should be in bold, but not all caps. Insert the SRN and the Source Location in the appropriate spaces in regular font.
- When the final permit is issued, insert the effective date of the permit which, in most cases, will be the date of issuance. Leave this blank on drafts. The date should be in word format (e.g., May 1, 2011).
- If the ROP is revised, add “Revision Date: {approval date}” on a new line after Effective Date. For multiple revisions, all dates are listed, adding a comma and the new revision date after the most recent previous revision date. The date should be in word format (e.g., May 1, 2011)
- Complete the name and title of the appropriate Decision Maker for signature.
- Verify that Source Name, ROP Number and Source Location are the same on both the certificate and the approval letter.

Box for ROP:

- Insert the ROP Number in the box on the certification sheet. The ROP number should be as follows: MI-ROP-{SRN}-{Year of Issuance}{Small letter in sequential order for any revisions} (e.g., MI-ROP-Z9999-2002a).

NOTE: For the Working Draft, Draft and Proposed ROPs, the year should be identified as 20XX.

- When the final permit is issued, **insert the expiration date** of the ROP. This date is 5 years from the effective date (e.g., issued May 30, 2011 - expiration date May 30, 2016). Leave this blank on working draft, draft and proposed ROPs.
- Insert the range of due dates for an administratively complete ROP renewal application. The application is due 6 to 18 months prior to the ROP expiration date. Count by months, not days (e.g., expiration date May 30, 2016 - due between November 30, 2014 and November 30, 2015). Leave this blank on working draft, draft and proposed ROPs.

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Box for Source-Wide Permit to Install (PTI):

- Insert the PTI number in the box on the certification page. The PTI number should be as follows: MI-PTI-{SRN}-{Year of Issuance}{Small letter in sequential order for any revisions} (e.g., MI-PTI-Z9999-2002a).
- If the source has no PTI's, delete the Source-Wide PTI box. See the Footnoting Instructions on page 7 for additional instructions.

NOTE: For the Working Draft, Draft and Proposed ROPs, the year should be identified as 20XX.

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Table of Contents

See “Final Steps” at end of this document for updating the Table of Contents.

Authority and Enforceability

Consent Orders or Judgments - If a source has a Consent Order or Judgment, the following language should be included on the Authority and Enforceability page after the last line:

- This permit does not relieve the permittee from any responsibilities or obligations imposed on the permittee, at this source, under Consent Order/Judgment Number _____, entered on _____, between EGLE and the permittee.

A. General Conditions

The General Conditions identify the requirements that apply to every source. These 46 conditions are similar to PTI General Conditions, and include 4 conditions specific to the Source-Wide PTI. They must be included in every ROP and should not be modified or deleted in part from any ROP.

Optional Conditions

IMPORTANT NOTE: These conditions should be added to the appropriate requirement table(s) as necessary and should not be included under the General Conditions.

They are source-specific requirements which may not apply to every source. Applicability must be determined on a case-by-case basis. If a condition is not applicable to the source, do not use the condition anywhere in the ROP. If a particular condition does apply, the condition should be included in the Source-Wide, Emission Unit, and/or Flexible Group Table(s) under “Other Requirements.” There should not be a separate component of the draft ROP titled “Optional Conditions.”

- **Using the ROP Shell, Cut and Paste any of the optional conditions that are applicable to the source into the appropriate requirement table(s).** In most cases, these conditions will be placed in the “Other Requirement” area of the appropriate table(s).
- When the draft ROP is complete, **delete** the entire set of Optional Conditions.

Acid Rain - If a source is subject to 40 CFR Part 72 requirements for acid rain, the following two conditions should be added to either the Emission Unit Table for each affected unit or the Flexible Group Table if it is structured to include multiple subject units. Insert the acid rain permit for all Title IV subject facilities as Appendix 9 or the first available appendix after Appendix 8.

- The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94 as outlined in a complete Phase II Acid Rain Permit issued by the AQD. Phase II Acid Rain Permit No. _____ is hereby incorporated into this ROP as Appendix _____. **(R 336.1902(1)(q))**
- The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to R 336.1902(1)(q) and 40 CFR 72.9(c)(1)(i). **(R 336.1213(10))**

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Alternative Operating Scenarios - If a source is permitted with alternative operating scenarios, the following condition should be included in the requirement table of each affected Emission Unit or Flexible Group or for the entire source if appropriate:

- The permittee shall maintain contemporaneous records at the facility of any changes from one operating scenario to another. This includes recording the scenario in question in a log, including, but not limited to: batch records, fuel records, operating schedule, or process records. **(R 336.1213(8)(a))**

Emissions Cap - This condition applies to the trading of emissions increases and decreases among process and process equipment **within the stationary source**, solely for the purpose of complying with an emissions cap per Rule 213(9). The condition should be included in the Source-Wide Conditions under “Reporting” only if the source has an emissions cap. Any other conditions with respect to emissions trading should be included in the appropriate Source-Wide, Emission Unit and/or Flexible Group conditions. **This does not pertain to the buying and/or selling of emission reduction credits between stationary sources.**

- The permittee shall provide written notification to the department and the EPA at least 7 days in advance of any emissions trade among process and process equipment within the stationary source, solely for the purpose of complying with an emissions cap. The notice shall state when the change will occur and shall describe the changes in emissions that will result and how these increases and decreases in emissions will comply with the terms and conditions of this permit. **(R 336.1213(9)(a))**

Streamlined Requirements - 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.

A footnote to the streamlined condition must be created, identifying all of the applicable requirements that have been subsumed within the streamlined condition. The less stringent (subsumed) applicable requirements are listed only in the footnote. The most stringent (streamlined) applicable requirements are listed both in the footnote and also in the Underlying Applicable Requirements column of the table.

Although streamlining may be initiated by either the applicant or the AQD, it can only be implemented where the permit applicant consents to its use.

A discussion of the details and the justification of the streamlined/subsumed conditions must be included in the Staff Report.

See the instructions in the “Staff Guidance on Streamlined/Subsumed Requirements” in the ROP Manual (4.G) for more information. When using footnotes for streamlined/subsumed conditions, use small letters sequentially in an individual table, then start over with the next table. For example, for the first streamlined condition in EU-1, use footnote “a”, then “b” for the next streamlined condition in that table. For streamlined conditions in EU-2 of the same ROP, use “a” again for the first streamlined condition, then “b”, then “c”, etc.

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Consent Order/Consent Judgment - If the source has a Consent Order or Consent Judgment, one of the following conditions should be added to the Source-Wide Conditions under “Other Requirements.”

Consent Orders:

- The conditions contained in this ROP for which a Consent Order is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Order. The effective date of termination is defined for the purposes of the conditions as the date upon which the Termination Order is signed by the Division Director of the AQD.

Consent Judgments:

- The conditions contained in this ROP for which a Consent Judgment is the only identified underlying applicable requirement shall be considered null and void upon the effective date of termination of the Consent Judgment.

Temporary Sources - If the source is temporary or portable, the following condition should be included in the appropriate Source-Wide, Emission Unit or Flexible Group conditions, under “Reporting:”

- The permittee of a temporary source shall notify the department not less than 10 days in advance of each change in location. **(R 336.1213(11))**

Sectioned ROPs with Stationary Source-Wide Requirements and Multiple Responsible Officials - This condition applies to a stationary source that has Source-Wide requirements and more than one Responsible Official.

Add this condition to the Source-Wide Conditions under “Other Requirements.”

- Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in General Conditions in Part A of the ROP and Rule 213(4)(c). **(R 336.1213(4)(c))**

Refer to Attachment 1 for detailed instructions on Sectioned ROPs.

For Non-EGUs that were subject to CAIR but are not subject to CSAPR

If you have non-EGUs that were previously subject to CAIR but are not subject to CSAPR, insert the following conditions in Section IX of the appropriate Emission Unit/Flexible Group Table.

- The permittee shall meet the monitoring, recordkeeping, and reporting requirements of the NO_x SIP Call during the ozone season (May 1 through September 30). **(40 CFR Part 96, Subpart H)**

Cross-State Air Pollution Rule (CSAPR) - If a source is subject to CSAPR requirements, place the following conditions in Section IX of the appropriate tables:

- The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NO_x Annual Trading Program, as specified in 40 CFR Part 97, Subpart AAAAA, and identified in Appendix **XX**. **(40 CFR Part 97, Subpart AAAAA)**
- The permittee shall comply with the provisions of the Cross-State Air Pollution Rule NO_x Ozone Season Group 2 Trading program, as specified in 40 CFR Part 97, Subpart EEEEE, and identified in Appendix **XX**. **(40 CFR Part 97, Subpart EEEEE)**

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- The permittee shall comply with the provisions of the Cross-State Air Pollution Rule SO₂ Group 1 Trading Program, as specified in 40 CFR Part 97, Subpart CCCCC, and identified in Appendix XX. **(40 CFR Part 97, Subpart CCCCC)**

Rule 801 - Standardized special conditions to be used for a NO_x emission unit subject to Rule 801 are located in Attachment 4.

CAM Plans – Standard conditions to be used for an Emission Unit subject to CAM are located in “Incorporating a CAM Plan into the ROP” in Attachment 5 of the instructions.

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ADDING FOOTNOTES IN THE ROP

To address EPA's concern with supersession issues, Rule 214a was promulgated to establish a Source-Wide PTI within each ROP. In effect, as each condition of an existing process-specific PTI is identified and included in a new ROP, it is also included in a new Source-Wide PTI. This Source-Wide PTI is issued simultaneously with the issuance of that ROP and they are contained in a single administratively consolidated document. The Source-Wide PTI Number and the effective date of this PTI are specified on the cover page of the permit. The ROP certificate portion includes the expiration date of the ROP within this consolidated document, but the PTI portion states that the Source-Wide PTI does not expire.

If later activities at the facility require certain pieces of equipment to undergo NSR, a separate process-specific PTI will be issued for the change. This PTI will then be incorporated into the ROP according to the methods prescribed in Rule 216 (or upon renewal, if appropriate). When the ROP is modified, the Source-Wide PTI will also be modified. The Source-Wide PTI number is updated by adding a small letter in sequential order to the PTI number to indicate that the PTI has been revised, e.g. MI-PTI-Z9999-2003a.

The process-specific PTI will be voided once all of its conditions have been rolled into the ROP/Source-Wide PTI. When the ROP is renewed, the Source-Wide PTI is given a new PTI number because it is simultaneously being reissued (not renewed).

There are two standard footnotes in the ROP Shell. Footnotes 1 and 2 must be used to designate if an ROP Special Condition is "state-only" enforceable or if it was originally included as a federally enforceable special condition in a PTI.

Also, there may be additional footnotes based on special circumstances. These may address the incorporation of federal consent decrees into the ROP (see ROP Manual (4.K) for instructions) and addressing obsolete rules such as Rule 220 (see Scenario 5 below).

The footnotes are associated with individual Special Conditions, NOT the associated underlying applicable requirement(s).

NOTE: If there is no Source-Wide PTI associated with an ROP, the footnote references at the bottom of each Emission Unit and Flexible Group Tables, should be removed.

Footnote 1 is used for any Special Condition in the ROP that is "state-only" enforceable.

- "State-only" enforceable special conditions are any Special Conditions that have an underlying applicable requirement that is not part of the State Implementation Plan (SIP), including Rules 224, 225 and 901, and are not established pursuant to Rule 213(3).
- This includes Special Conditions that are based on state-only enforceable rules, even if they were established in a PTI or consent order/consent judgment.
- State-only enforceable conditions must be considered part of a Source-Wide State-only enforceable permit to ensure that these conditions remain in effect if the ROP is voided. In the rare event that a State-only condition was not initially established in a PTI, and the company objects to considering it part of a Source-Wide State-only permit, consult with your District Supervisor. Limited flexibility is allowed for this unique situation. In such a situation, the ROP must comply with Rule 213(5)(a) and designate the condition as a State-only condition; however, the last phrase of Footnote 1 may be deleted. This footnote would then read "This condition is state-only enforceable" and may need a new footnote number. The second bullet under Permit Enforceability in the General Conditions can also be adjusted to read "Those conditions that are hereby incorporated as State-only enforceable are designated by Footnote X." Note that Rule 214a(5) specifically requires State-only conditions

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that came from a PTI be incorporated into a State-only Enforceable permit within the ROP, so the standard wording must be used in typical situations.

Footnote 2 is used for any Special Condition in the ROP that is federally enforceable AND originated in a Permit to Install.

- Any Special Condition that was established in a PTI and is not State-only enforceable is covered.
- This includes Special Conditions that were established in a PTI pursuant to any state rule except Rules 224, 225 and 901. This also includes any Special Conditions that were established in a PTI pursuant to a federal rule or regulation such as 40 CFR 52.21 or Section 112(g) or Section 112(j) of the Clean Air Act.

Any Special Condition with Footnote 2 is incorporated in the Source-Wide PTI.

No footnote is used for a Special Condition in the ROP that doesn't meet either of the two above criteria.

- Special Conditions that originate from a federal regulation, such as a NESHAP, NSPS or a MACT, and were not originally included in a PTI do not get footnoted.
- Footnotes are not given to periodic monitoring requirements that are established in the ROP pursuant to Rule 213(3) or CAM

ROP Renewals should identify the appropriate footnotes for all special conditions from PTIs that were previously incorporated into the initial ROP. At a minimum, this includes the Special Conditions with underlying applicable requirements listed in Rule 214a(3)(b).

When a Special Condition is footnoted, the following guidance should be used:

- A footnote can be inserted from the ROP Shell Add-in Tab.
- For special conditions in the **Emission Limit or Material Limit tables**, insert the footnote immediately after the limit in the second column.
- For special conditions in the **Stack/Vent table**, insert the footnote immediately after both the height and diameter conditions.
- For non-tabular **text conditions**, insert the footnote after the condition text but BEFORE the UAR citation.
- Only Footnote 1 or Footnote 2 should be used, not both.

NOTE: Some special conditions will require the use of both Footnote 2 and a UAR of Rule 201(3). When the only UAR for a condition is Rule 201(3) (a condition from a PTI that was added to assure compliance with all applicable requirements), it must be identified as such. Footnote 2 would still be used in this case because it serves to designate the condition as part of the Source-Wide PTI.

When two identical conditions are incorporated into the ROP, with one from a PTI and one not, list them twice and add a footnote to the appropriate one. See the example below.

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I. EMISSION LIMITS

Pollutant	Limit	Time Period / Operating Scenario	Equipment	Testing / Monitoring Method	Underlying Applicable Requirements
1. PM	0.15 lbs per 1,000 lbs exhaust gas, corrected to 50% excess air ²	Hourly	EUBOILER2	SC V.1	R 336.1331(1)(c)
2. PM	0.10 lbs per 1,000 lbs exhaust gas	Hourly	EUBOILER2 dry fly ash transfer tower – including the transfer tank, hoppers, and vacuum exhauster.	SC V.2	R 336.1331(1)(a)

The following scenarios describe different situational uses of the footnotes.

Scenario 1 - If the condition comes from a PTI and is federally-enforceable, Footnote 2 is required.

Example:

The permittee shall not operate the oven degreaser (EU-C631) unless the thermal oxidizer is installed and operating properly.² (R 336.1702(a), R 336.1910)

In this case, Footnote 2 is used because the condition came from a PTI (Rule 201) and was the result of BACT review (Rule 702(a)). Rule 910 is also federally enforceable. Therefore, the condition is federally enforceable.

Scenario 2 – If the condition is state-only enforceable, and comes from a PTI, Footnote 1 is required. This would include any condition where the UAR(s) is Rule 224, 225 and/or 901 ONLY.

Example:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirement
1. SV-H450 (Brazing Furnace Stack)	36 ¹	44 ¹	R 336.1225 R 336.1901
2. SV-H451a (Thermal Oxidizer Stack)	22 ¹	50.1 ¹	R 336.1901
3. SV-H451b (Oil mist Filter Stack)	36 ¹	51.1 ¹	R 336.1901

In this example, Footnote 1 is used because the basis for the stack parameters was Rule 225 and Rule 901, which are not included in the SIP or otherwise federally-enforceable, even though the stack parameters were included in a Permit to Install (Rule 201).

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Example:

The permittee shall not operate any tank that contains chromic acid in each of the surface coating machines (EU-C733 & EU-C832) unless a temperature monitor and an automatic sound and visual alarm system that activates at a temperature above 160°F is installed.¹ **(R 336.1225)**

In this case, Footnote 1 is used because the only applicable requirement for the condition is Rule 225, which is not included in the SIP or otherwise federally-enforceable, even though the condition came from a PTI.

Scenario 3 – If the condition comes from a PTI and has several UARs, some that are federally-enforceable and others that are state-only enforceable, Footnote 2 is required. If the UARs include Rules 224, 225 and/or 901, in addition to any federally-enforceable UAR(s), use only Footnote 2. (Note that an individual UAR being state-only enforceable does not affect the federal enforceability of the condition in this situation.)

Example:

The permittee shall continuously monitor the temperature of the thermal oxidizer associated with the oven degreaser (EU-C467).² **(R 336.1205, R 336.1224, R 336.1225, R 336.1331, R 336.1901, R 336.1910)**

In this case, Footnote 2 is used even though Rules 224, 225 and 901 are listed as UARs. This is because Rules 205, 331 and 910 are federally enforceable. Therefore, the condition is federally enforceable.

Example:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirement
1. SV-C91 (Parts Degreaser Stack)	12 ¹	42 ¹	R 336.1225 R 336.1901
2. SV-C467a (Thermal Oxidizer Stack)	24 ²	50 ²	R 336.1225 R 336.1901 40 CFR 52.21(c) & (d)

In this example, Footnote 1 was used for the first stack. Even though the condition was included in a PTI (Rule 201), the basis for the stack parameters was Rule 225 and Rule 901, which are not included in the SIP, so the condition is considered state-only enforceable. Footnote 2 was used for the second stack because the condition was included in a PTI (Rule 201) and the stack parameters were required to ensure compliance with PSD (40 CFR 52.21). Even though Rule 225 and Rule 901, which are not included in the SIP, were also listed as UARs, the stack parameters are federally enforceable.

Scenario 4 – If the condition does not come from a PTI and Rule 213(3)) is the only UAR, no footnote is used.

Example:

The permittee shall perform and document non-certified visible emissions observations on a daily basis when operating. If during the observation there are any visible emissions detected from an emission point, a USEPA Method 9 certified visible emissions observation shall be conducted for a minimum of 15 minutes to determine the actual opacity from that emission point. Records of the non-certified visible emissions observations, USEPA Method 9 observations that are performed, the reason for any visible emissions observed, and any corrective actions taken shall be kept on file and made available to the Department upon request. **(R 336.1213(3))**

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In this example, no footnote is used because this condition was created through the ROP process.

Scenario 5 – If the condition is federally enforceable and did not come from a PTI, no footnote should be used. Examples of this are NSPS or MACT requirements not originating in a PTI.

Example:

The permittee must operate and maintain affected sources in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the AQD that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. **(40 CFR 63.7500(a)(3))**

In this case, no footnote is used because the condition was created through the ROP.

Scenario 6 - To address a rescinded rule where the requirements still apply because they were included in a PTI (such as Rule 220), see the example below. Make sure to add an appropriate descriptive footnote, if necessary.

An example of the footnote used for Rule 220 is below (footnote 3). Typically, Rule 201(1)(a) would only be referenced as footnote 2, but in this scenario, it is cited in the table below as a substitute UAR for the rescinded rule.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	272.4 pph ^{2, 3}	Hourly	FGEPS	SC V.1	R 336.1201(1)(a) R 336.1702(a)
2. VOC	374.5 tpy ^{2, 3}	12-month rolling time period as determined at the end of each calendar month	FGEPS	SC VI.1, SC VI.2	R 336.1201(1)(a) R 336.1702(a)

II. MATERIAL LIMIT(S)

1. The permittee shall limit the annual throughput of EPS beads in FGEPS at expansion as specified below, based on a 12-month rolling time period as determined at the end of each calendar month.^{2, 3} **(R 336.1201(1)(a), R 336.1702(a))**

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

³ This condition was established pursuant to Rule 220 as it applied at the time of permitting in PTI No. [], issued on [DATE]. This limit was established under Nonattainment New Source Review which required LAER and emission offsets for VOC. Rule 220 has since been rescinded and the Nonattainment New Source Review requirements are now in Rule 1908

Footnoting for Streamlined/Subsumed Conditions

As an example, for the first streamlined condition in EU-1, use footnote letters “a”, then “b” for the next streamlined condition in that table. For additional streamlined conditions in EU-2, use “a” again for the first streamlined condition, then “b”, then “c”, etc..

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B. Source-Wide Conditions

Use Part B for any requirements which apply to all Emission Units at a stationary source. See General Instructions below for completing the Source-Wide Conditions. If no Source-Wide conditions apply, leave the two introductory paragraphs, but delete the Source-Wide Conditions.

If the ROP is sectioned, refer to the Optional Requirements for “**Sectioned ROPs with Stationary Source-Wide Requirements and Multiple Responsible Officials.**”

C. Emission Unit Summary Table/Conditions

Use the Emission Unit Summary Table to identify every Emission Unit at the source.

- If the permit is not sectioned, create only one summary table and do not give the table a number.
- If there is more than one Section in the permit, create a separate summary table for each Section.

Complete each summary table as follows:

- **Emission Unit ID:** Provide the ID created by the applicant. Create additional rows to accommodate all Emission Units at the source or within each Section.
- **Emission Unit Description:** Provide a brief description of the Emission Unit.
- **Installation/Modification Date:** Indicate the original installation date of the Emission Unit (the date when the first device of the unit was installed). If any modifications have been done, also include the date of the most recent modification. Separate the two dates with a slash (/). Dates should be written using dashes between month-day-year.
- **Flexible Group ID:** If an Emission Unit is part of a Flexible Group, identify the Flexible Group. If there is no associated Flexible Group, list NA.

See General Instructions below for completing the detailed Emission Unit Conditions.

D. Flexible Group Summary Table/Conditions

Use the Flexible Group Summary Table to list all Flexible Groups created in the application.

- If there are no Flexible Groups in the ROP, leave the two introductory paragraphs and delete the Flexible Group Summary and Flexible Group Conditions from the shell document.
- If the permit is not sectioned, create only one summary table and do not give the table a number.
- If there is more than one Section in the permit, create a separate summary table for each Section.

Complete each summary table as follows:

- **Flexible Group ID:** Provide the Group ID created by the source or the AQD. Create additional rows to accommodate all Flexible Groups at the source or within each Section.
- **Flexible Group Description:** Describe the Flexible Group.
- **Associated Emission Unit IDs:** List the Emission Unit IDs included in each listed Flexible Group.

See General Instructions below for completing the detailed Flexible Group Conditions.

General Instructions for Parts B, C and D

- All conditions that are put into the ROP must be written clearly and must be enforceable. In addition, the limitations, controls and requirements in the ROP must be permanent, quantifiable, and otherwise

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enforceable as a practical matter. When paraphrasing a rule or regulation, be sure that the complete intent of the rule/regulation has been stated and that the requirement is not changed in the process.

- The entire underlying applicable requirement(s) must be identified for each condition and should be in bold type at the end of the condition. {e.g., **(R 336.1213(3))**}. An underlying applicable requirement may be a state rule or a federal regulation. In addition, if a Consent Order or Judgment exists for the source, any conditions from the order or judgment which are incorporated as requirements must identify the Consent Order or Judgment Number and the specific paragraph number in addition to the underlying applicable requirement(s). All appropriate underlying applicable requirements should be identified.
- To create additional Emission Unit(s) or Flexible Group(s), add a page break at the point where you want to add the new Unit/Group (press CTRL-Enter or use the Insert feature from the menu bar). Click on the Add-in Tabs for “ROP Language Insert,” then click on the button for “Emission Unit,” “Flexible Group,” or a specific Flexible Group such as Rule 287(2)(c) or Rule 290. See Attachment 2 for further details.
- When using NA, be sure to eliminate the condition number.
- All conditions within the emission limit and material limit tables should be centered, with the exception of the pollutant and material which are numbered and should be left justified.

Heading: Insert the ID in place of the form field. If this is a Sectioned permit. See Attachment 1 for sectioning instructions.

DESCRIPTION: Describe the Emission Unit or Flexible Group. This description may be more detailed than what was provided in the Emission Unit Summary table.

Flexible Group ID/Emission Unit ID: For an Emission Unit, list the Flexible Group ID(s), if any, that contain(s) other requirements for that Emission Unit. An example would be “Flexible Group ID: FGPAINTBOOTH.” If there are no Flexible Groups to identify, insert NA. For a Flexible Group, list the Emission Units that are contained in the Flexible Group.

POLLUTION CONTROL EQUIPMENT: List any control device that controls emissions from the equipment identified in the emission unit or flexible group. If there are multiple control devices, list them all. If there is no control, list NA.

I. EMISSION LIMITS

Emission limits are restrictions over a given period of time on the amount of a pollutant which may be emitted from a source to the outside air. These limits may be used to set and/or restrict a facility’s potential to emit, which in turn, determines which regulations a facility will be subject to. Any concentration limits, emission rates, or mass emission limits for any given pollutant should be included in the Emission Limits table. Emission limits can be expressed in a number of different units such as concentration (parts per million (ppm), micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), emission rates (pounds per million British Thermal Unit (lbs/MMBTU)), or mass (pounds per hour (pph), tons per year (tpy)) for a wide variety of air contaminants (criteria pollutants, toxic air contaminants or hazardous air pollutants). At times, both a mass emission limit and an emission rate may be required for the same pollutant. Visible emission limits are used for Emission Units that have an applicable requirement that establishes a lower limit than is allowed in the General Condition (Rule 301(1)(a)), or may require a lower limit to assure compliance for other reasons as set by the department.

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Number each emission limit special condition (SC) sequentially, one item per line. If there are multiple limits for the same pollutant, each limit is placed on a separate line. For all emission limits, provide the following in the appropriate box:

- **Pollutant:** Identify the pollutant for which the emissions are being limited (e.g., VOC, PM₁₀, HAP, visible emissions).
- **Limit:** Enter the numeric limit and the units associated with the numeric limit (e.g., pph, tpy, ppm, lbs/1000 lbs of exhaust gas, lbs/MMBTU). **NOTE:** Use abbreviations as listed in the abbreviation table.
- **Time Period/Operating Scenario:** This column is used to describe limits that are based upon a compliance period that is time based (e.g., 24-hour block average, 24-hr rolling average as determined each hour the boiler operates, calendar day, 12-month rolling time period as determined at the end of each calendar month). If compliance is based upon a stack test, this column should refer to the minimum amount of time the testing method would require (e.g., hourly, 6-minute average). **NOTE:** The language "Test Protocol" should not be used in this column. **Equipment:** If the equipment is a subset of Source-Wide, Emission Unit or Flexible Group, describe accordingly; otherwise, enter Source-Wide or the Emission Unit or Flexible Group name.
- **Monitoring/Testing Method:** Cite the numbers of the SCs that will be used as the primary methods to determine compliance (e.g., SC V.3, SC VI.3). You may wish to finish this box **AFTER** establishing the final SCs for the Emission Unit/Flexible Group to avoid problems with renumbering that might occur before the permit is final. **NOTE:** GC 13 should not be cited here alone, per EPA.
- **Underlying Applicable Requirement:** Enter the citation of the rule(s) or regulation(s) that are the basis for the limit (e.g., **R 336.1301(1)(c)**) in bold.

Conditions that do not conform to the format of the Emission Limits table can be added sequentially after the table.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	7.7 pph ²	Hourly	EU207-02	SC V.1, SC VI.2	R 336.1702(a)
2. VOC	8.7 tpy ²	12-month rolling time period as determined at the end of each calendar month	EU207-02	SC V.1, SC VI.2, SC VI.3	R 336.1702(a)
3. PM	0.01 lbs/1,000 lbs of exhaust gas, on a dry gas basis ²	Hourly	EU207-02	SC V.1	R 336.1331(1)(c)

II. MATERIAL LIMITS

Material limits are used to restrict the amount of fuel or raw materials used in the Emission Unit, to restrict the amount of a specific constituent (VOC, acetone, formaldehyde, etc.) in a material used in the Emission Unit, or to limit the usage rate of any process materials (e.g., fuel, coatings, raw materials). All such limits can be included in the Material Limits table. **NOTE:** If the PTI does not have material limits in a tabular form, leave them in the original form. The underlying applicable requirement must be identified for each limit. Number each material SC sequentially, one item per line.

- **Materials:** Identify the material being limited.

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- **Limit:** Enter the numeric limit and the units associated with the numeric limit (e.g., pph, lbs/day, lbs/month, tpy). NOTE: Use abbreviations as listed in the abbreviation table.
- **Time Period/Operating Scenario:** This column is generally used to describe limits that are based upon a compliance period that is time based (e.g., calendar day, calendar month, 12-month rolling time period as determined at the end of each calendar month). In cases where compliance will be based upon a single random grab sample such as a coating VOC content, enter the word “instantaneous” in this box. For fuel sulfur content or other content limits where compliance is based on a grab sample or specification sheet, putting it in tabular form is not recommended.
- **Equipment:** If the equipment is a subset of Source-Wide, Emission Unit or Flexible Group, describe accordingly; otherwise, enter Source-Wide, or the EU or FG name.
- **Monitoring/Testing Method:** Enter the SC numbers for the conditions that will be used as the primary methods to determine compliance (e.g., SC V.1, SC VI.3). You may wish to finish this box AFTER establishing the final SCs for the emission unit/flexible group to avoid problems with renumbering that might occur before the permit is final.
- **Underlying Applicable Requirement:** Enter the citation of the rule(s) or regulation(s) that are the basis for the limit (e.g., **R 336.1205(1)(a)**, **R 336.1702(a)** in bold.)

Conditions that do not conform to the format of the Material Limits table can be added sequentially after the table.

III. PROCESS/OPERATIONAL RESTRICTIONS

These are requirements that identify specific parameters to be met during operation. Process and operational limits are restrictions on the manner in which a source may run an emission unit/flexible group. They include specific work practice standards, limits on operating schedules, and how materials are handled. A process/operational restriction may require compliance with specific plans such as a fugitive dust or a preventative maintenance/malfunction abatement plan (PM/MAP), procedures or provisions of a rule or regulation.

These conditions should be written out in complete sentences, including all details necessary to make the condition enforceable, and the underlying applicable requirement(s) should be cited. (Refer to the Special Conditions Master List or Permit to Install templates link on the AQD Permits page of Share Point (<https://stateofmichigan.sharepoint.com/sites/EGLE-SPC-Inside-Documents/SitePages/Forms-and-Templates.aspx>) for standard language.) Each condition under this heading should be numbered sequentially. The entire underlying applicable requirement(s) must be identified for each condition and should be in parentheses in bold type {e.g., (**R 336.1213(2)**, **R 336.1911**)}. If no Process/Operational Restrictions apply, enter NA.

IV. DESIGN/EQUIPMENT PARAMETERS

These are requirements that specify the way equipment must be designed for proper operation. They may include limits on process parameters (e.g., maintain a specific temperature or pressure) which define satisfactory operation, to maintain compliance with a condition or rule/regulation. Examples of these requirements include specific control equipment requirements or a process design. (Refer to the Special Conditions Master List or Permit to Install templates link on the AQD Permits page of Share Point (<https://stateofmichigan.sharepoint.com/sites/EGLE-SPC-Inside-Documents/SitePages/Forms-and-Templates.aspx>) for standard language.) All underlying applicable requirement(s) must be identified for each condition and should be in parentheses in bold type {e.g., (**R 336.1213(2)**, **R 336.1910**)}. If no Design/Equipment Parameters apply, enter NA.

V. TESTING/SAMPLING

Testing conditions are used as a means of verifying compliance with emission and material limits, or control equipment performance. This part should be used to identify any testing/sampling that is specifically

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required. Provide enough information to outline what the testing/sampling is for such as the specific pollutant being tested or sampled. Standard testing condition language is in the **ROP Template Shell**, **ROP Template for Emission Unit Conditions**, and **ROP Template for Flexible Group Conditions**, and includes test methods, submittal of protocols and results, and frequency. Appendix 5 can be used to identify any special details of the testing methodologies. Appendix 4 can be used for lengthy recordkeeping details. If there are multiple requirements (e.g., three parameters to be tested for, two different testing schedules), number each condition sequentially. The entire underlying applicable requirement(s) must be identified for each condition and should be in parentheses in bold type {e.g., **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**}. If no Testing/Sampling conditions apply, enter NA.

If testing requirements are coming from a PTI that does not include test methods, frequency, or notification, then these need to be added as separate special conditions.

Example with multiple pollutants to be tested:

1. The permittee shall verify PM, PM10, PM2.5, and NOx emission rates from EUBOILER...²
2. Testing shall be performed using an approved EPA Method listed in:

Pollutant	Test Method Reference
PM	40 CFR Part 60, Appendix A; Part 10 of the Michigan Air Pollution Control Rules
PM10/PM2.5	40 CFR Part 51, Appendix M
NOx	40 CFR Part 60, Appendix A

An alternate method, or a modification to the approved EPA Method, may be specified in an AQD-approved Test Protocol and must meet the requirements of the federal Clean Air Act, all applicable state and federal rules and regulations, and be within the authority of the AQD to make the change. **(R 336.1213(3), R 336.2003, R 336.2004)**

3. The permittee shall verify the PM, PM10, PM2.5, and NOx emission rates from EUBOILER, at a minimum, every five years from the date of the last test. **(R 336.1213(3), R 336.2001, R 336.2003, R 336.2004)**
4. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 30 days before testing of the time and place performance tests will be conducted. **(R 336.1213(3))**

If testing is not required but may be requested, add "Upon request of the AQD District Supervisor, the permittee shall..." to the beginning of the testing condition. If requested, the following language can be added to the test method condition: The hourly emission rate shall be determined by the arithmetic mean outlined in R 336.2003(2).

Any EU/FG that has a VOC limit for coatings should include the following testing requirement:

1. The permittee shall determine the VOC content, water content and density of any coating, as applied, using federal Reference Test Method 24. **{Choose one testing frequency:}** The five most frequently used coatings/adhesives plus five random coatings shall be tested on an annual basis. **{OR}** Random testing of coatings shall be conducted on a yearly basis with all coatings tested within a five-year period. **{OR}** Coatings shall be tested once a year or as soon as new coatings are put into regular use. **{OR}** The five most frequently used coatings and 10% of the remaining coatings shall be tested on an annual basis. The permittee must submit a complete report of the test results to the AQD Technical Programs Unit

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and District Office within 60 days of the end of the year. (**R 336.1213(3)**, **R 336.2001(5)**, **R 336.2004**, **R 336.2040(5)**)

Delete out the optional test frequencies you are not selecting.

VI. MONITORING/RECORDKEEPING

Monitoring conditions are used as a means of verifying compliance with requirements, such as process/operational limits or equipment requirements. Monitoring consists of a very broad range of activities. Monitoring can be something as simple as a device that measures/determines temperature, pressure or airflow in a stack; visual observations of a stack for emissions or periodic inspections of equipment. Monitoring can also be a more sophisticated approach such as a continuous emission monitoring system (CEMS). Special conditions for installation and proper operation of process monitoring equipment should be in Section IV. DESIGN/EQUIPMENT PARAMETERS.

Recordkeeping requirements are a primary means of verifying compliance with requirements such as emission limits, process/operational limits, and equipment requirements. Recordkeeping involves documenting the operation of an emission unit. It can include keeping track of the amount of raw materials used, the number of pieces produced, the number of hours operated, records of emissions using mass balance methodologies, and records from process monitors.

Identify any monitoring requirements in sequential order. Include enough detail to identify what is to be monitored. Lengthy specifics should be spelled out in Appendix 3, 4, and/or 7. Include the statement "See Appendix 3" if that appendix is used to provide additional details of the monitoring program/plan. Use Appendix 4 for detailing recordkeeping formats. Use Appendix 7 to identify detailed emission calculations. If there are multiple records for emission and parametric monitors (e.g., CEMS, COMS, separate process monitors), number each condition sequentially.

The entire underlying applicable requirement(s) must be identified for each condition and should be in parentheses in bold type {e.g., (**R 336.1213(3)**)}.

VII. REPORTING

These requirements describe ALL required reporting. Provide enough information to outline reporting requirements. Appendix 8 should be used to identify any lengthy details of the reporting. Number each requirement sequentially under this heading. The entire underlying applicable requirement(s) must be identified for each condition and should be in parentheses in bold type {e.g., (**R 336.1213(3)**)}. "See Appendix 8" should not be deleted.

VIII. STACK/VENT RESTRICTIONS

These conditions specify the design parameters for the exhaust stacks or vents that emit regulated air contaminants. Number the stacks sequentially, one stack per line. Insert the following information for each stack or vent:

- **Stack/Vent ID:** Enter the ID created by the source in the application.
- **Maximum Exhaust Dimension:** For a round stack, enter the inside diameter in inches; for a square or rectangular stack, enter the inside dimension (length and width) in inches.
- **Minimum Height Above Ground:** Enter the stack height above ground level in feet.
- **Underlying Applicable Requirement:** Enter the underlying applicable requirement(s) for the given stack parameters.

If there is no underlying applicable requirement for a given stack, do not include it in the ROP. If no Stack/Vent Restrictions apply, delete the table and statement and enter NA.

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IX. OTHER REQUIREMENTS

Conditions or requirements that do not fit into any of the other headings (e.g., an NSPS requirement) are considered "Other Requirements." The conditions must be written out in complete sentences with as much detail as possible, including any specifics that are enforceable, and citation of the underlying applicable requirement. Multiple requirements should be numbered sequentially.

The entire underlying applicable requirement(s) must be identified for each condition and should be in parentheses in bold type {e.g., **(R 336.1213(3))**}. If no Other Requirements apply, enter NA.

E. Non-Applicable Requirements Table

Only requirements that the source has identified, and certified to in the application, and that have been verified during technical review as non-applicable can be identified in the final permit for the permit shield.

- If the applicant has not identified any non-applicable requirements, select the second paragraph from the shell document (which explains why this part is not applicable to the ROP) and delete the table.
- If the permit is not sectioned, create only one summary table.

If there is more than one Section in the permit, create a separate summary table for each Section.

Complete each table as follows:

- **Emission Unit/Flexible Group ID:** List the Emission Unit or Flexible Group to which the requirement applies. If the requirement could apply to the entire source, write "Source-Wide."
- **Non-applicable Requirement:** Cite the rule number or federal regulation (e.g., Rule 604, 40 CFR Part 60, Subpart K). Provide a brief description of the rule or regulation (e.g., storage of organic compounds, storage vessels for petroleum liquids).
- **Justification:** Provide a brief explanation why the Emission Unit/Flexible Group or the Stationary Source is not subject to the requirement (e.g., material stored has vapor pressure less than 1.5 psia, equipment capacity smaller than applicability definition).

Appendices

The ROP will contain several appendices to provide detailed information that is supplemental to the Special Conditions. **Every** ROP will contain Appendices 1 through 8. All Title IV subject sources will contain an Appendix 9 for the Acid Rain portion of the ROP. In addition, if the source is subject to CSAPR, the requirements will be in the ROP and referenced in Appendix 10.

If the permit is sectioned, each Section of the permit will have its own set of appendices. The appendix number should be followed by the permit Section ID (i.e., Section 1: Appendices 1-1, 2-1, 3-1, etc., Section 2: Appendices 1-2, 2-2, 3-2). Additional appendices may be added to the permit as needed. Any attachments to the permit should be made using an appendix. Format spacing to provide adequate visual break between the individual appendices; a separate page is not required for each of the appendices.

Appendix 1. Abbreviations and Acronyms

This appendix should be included in each ROP. It alphabetically lists the abbreviations and/or acronyms that may be used in the permit. None of the standard abbreviations or acronyms in this appendix should be deleted; new ones that are not already included may be added.

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Appendix 2. Schedule of Compliance

This appendix will include the Special Condition(s) with respect to the compliance status of the source at the time of permit issuance and must be included in each ROP. There are two options for this appendix.

If the source will not be in full compliance with **all** of the applicable requirements at the time of permit issuance, select the first option and include a list of the requirements with which the source will not be in compliance in the first paragraph. Add a narrative description of the compliance plan under the Compliance Plan heading. A Schedule of Compliance Table must be included in this appendix to outline the source's plan to achieve compliance. If this option is used, delete the second option (the last paragraph). Complete the Schedule of Compliance Table as follows:

- **Emission Unit/Flexible Group ID and Condition No(s):** List the EU or FG ID(s) and condition number(s) that are the subject of the Schedule of Compliance.
- **Applicable Requirement:** Identify the requirement(s) to which the EU/FG is subject (e.g., R 336.1201, AQD No.____-01, Paragraph 10.C).
- **Remedial Measures:** Describe the required outcome to bring the EU/FG into compliance (e.g., Obtain a Permit to Install).
- **Required Action:** Describe the steps to be taken by the source to meet the remedial measure (e.g., Submit PTI application; Submit written monthly permit application status reports to the AQD District Supervisor; Provide all additional information requested by the AQD Permit Section requested to process the PTI application; Submit in writing acceptance of draft PTI conditions to AQD Permit Section).
- **Milestone Dates:** Identify the date(s) by which the required action(s) must be taken. (e.g., for the above example, Required Actions: December 1, 2002; January 1, 2003 for initial report and every month thereafter; Within 30 calendar days of a written request from the AQD; Within 30 calendar days of the draft PTI permit conditions being sent to the source).
- **Progress Reports:** Identify the date(s) by which required progress reports must be submitted to the AQD.

If the source will be in full compliance with **all** applicable requirements at the time of permit issuance, delete the entire first option, including the table, and select the second option. If this paragraph is used, delete the first option.

See Attachment 3 to these instructions for additional guidance on the Schedule of Compliance and example tables.

Appendix 3. Monitoring Requirements

This appendix is to be used by the permit writer to describe any detailed monitoring requirements. It may include monitoring procedures identifying the parameter to be monitored, performance specifications, monitor specifications, averaging times to be used, certification methods, or any other monitoring details which were too lengthy to include in the Monitoring/Recordkeeping portion of the associated Source-Wide, Emission Unit or Flexible Group. These requirements should be written similar to the monitoring conditions presently used in Permits to Install or in any other manner acceptable to the permit writer and permittee. (Refer to the Special Conditions Master List or Permit to Install templates link on the AQD Permits page of Share Point (<https://stateofmichigan.sharepoint.com/sites/EGLE-SPC-Inside-Documents/SitePages/Forms-and-Templates.aspx>) for standard language.)

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There are two options listed in this appendix:

- Select the first option for any detailed monitoring requirements and insert Source-Wide, the Emission Unit, or the Flexible Group from Part B, C, or D that this appendix is supplementing. This sentence must be repeated for each individual plan in the appendix. If it is used more than once in the same appendix, number or bullet each new item. Describe the monitoring requirement details.
- Select the second option if there are no other detailed monitoring requirements described in the ROP.

Appendix 4. Recordkeeping

This appendix is to be used by the permit writer for any detailed recordkeeping requirements. It should include specific recordkeeping procedures or formats approved by the AQD during technical review that must be used by the permittee to comply with an applicable requirement.

There are two options listed in this appendix:

- Select the first option for any detailed recordkeeping requirements and insert Source-Wide, the Emission Unit, or the Flexible Group from Part B, C, or D that this appendix is supplementing. This sentence must be repeated for each recordkeeping plan in the appendix. If it is used more than once in the same appendix, number or bullet each new item. Describe the recordkeeping requirement details.
- Select the second option if there are no other detailed recordkeeping requirements described in the ROP.

Appendix 5. Testing Procedures

This appendix is to be used by the permit writer to describe any detailed testing methods or procedures approved by the AQD during technical review that must be used by the permittee to determine compliance with an applicable requirement.

There are two options listed in this appendix:

- Select the first option for any detailed testing requirements and insert Source-Wide, the Emission Unit, or the Flexible Group from Part B, C, or D that this appendix is supplementing. This sentence must be repeated for each testing plan in the appendix. If it is used more than once in the same appendix, number or bullet each new item. Describe the testing requirement details.
- Select the second option if there are no other detailed testing requirements described in the ROP.

Appendix 6. Permits to Install

BACKGROUND

To address EPA's concerns regarding the voiding of NSR permits after issuance of the ROP, Rule 214a was promulgated and requires the issuance of a consolidated PTI within each ROP. As each condition of an existing process-specific PTI is identified and included in an ROP, it is also included in a new Source-Wide PTI. This Source-Wide PTI will be issued simultaneously with the issuance of the ROP. The individual, process-specific PTIs may then be voided because all of the requirements have been incorporated into the Source-Wide PTI. This new consolidated PTI will be effective for the life of the stationary source and will remain in effect even if the ROP later expires. If later activities at the facility require certain pieces of equipment to undergo NSR, a separate process-specific PTI will be issued for the new activities. This PTI will then be incorporated into the ROP according to the methods prescribed in Rule 216 (or upon renewal,

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if appropriate). When the ROP is modified, the Source-Wide PTI will also be modified. Once all of its conditions have been rolled into the ROP/Source-Wide PTI, the process-specific PTI will be voided.

If the ROP expires or is voided, a Source-Wide PTI that includes all conditions with Footnotes 1 and 2 will remain in effect. If an ROP is voided but the Source-Wide PTI needs to remain in effect see the “Procedure to Void an ROP” in the ROP Manual (7.B) for instructions on how to do this. If there is no Source-Wide PTI associated with the ROP (i.e., no PTIs have ever been issued), select the first optional paragraph from the ROP template sheet.

INSTRUCTIONS

When the Source-Wide PTI is formally established within the ROP, it is given a unique PTI number. Enter the Source-Wide PTI No. in the Source-Wide PTI box on the ROP Certification Page. When the ROP is renewed, the Source-Wide PTI is given a new PTI number because it is simultaneously being reissued (not renewed).

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Initial ROP:

Choose the “For Initial ROP Issuance” language in Appendix 6. The appendix provides a table where all Permits to Install and/or Operate that relate to the identified Emission Units or Flexible Groups should be listed. The permits should be listed in ascending order.

- List all Permits to Install and/or Operate which have been identified either in the application or during technical review and which have applicable requirements being incorporated into the ROP.
- Provide a brief description of the equipment.
- Identify the Emission Unit or Flexible Group for the equipment using the Operator’s ID.

ROP Renewal:

Choose the “For ROP Renewal” language in Appendix 6. Fill in the previously issued ROP number. This permit number should be either an initial or renewal and should not be for any revision that was issued in the interim (i.e., the number should not have any sequential letter a, b, c). Then fill in the previous Source-Wide PTI number (this should reflect the most recent revision number so it may have a sequential letter a, b, c) and the new Source-Wide PTI number in the appropriate sections of the introductory paragraph.

The table in the Appendix should be used to list all PTIs that were issued and all modification applications received AFTER the effective date of the initial or most recent renewal ROP, including PTIs that were incorporated into the ROP through amendment or modification. If a modification application listed in the table is being issued concurrently with the ROP renewal, the application number should be asterisked (i.e., * 201000056). The table will also include any modification applications that have already been processed and these will not be asterisked.

For a PTI that does not have an associated ROP revision application or an ROP revision application that does not have an associated PTI, enter NA in the appropriate column in the table.

NOTES: All PTIs that were previously voided upon incorporation into earlier ROPs must be listed in the Staff Report.

Be sure to log the issuance dates in MACES for any ROP modification application being issued through the renewal.

Appendix 7. Emission Calculations

This appendix may be used by the permit writer to include any detailed calculations the permittee must use in conjunction with monitoring, testing or recordkeeping data to determine compliance with an applicable requirement.

There are two options listed in this appendix:

- Select the first option for any detailed emission calculation requirements and insert Source-Wide, the Emission Unit or the Flexible Group from Part B, C, or D that this appendix is supplementing. This sentence must be repeated for each calculation in the appendix. If it is used more than once in the same appendix, number or bullet each new item. Provide the detailed calculation and any other pertinent information (assumptions, data to be used).
- Select the second option if there are no other detailed calculations described in the ROP.

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Appendix 8. Reporting

This appendix will include specific reporting procedures or formats approved by the AQD during technical review that must be used by the permittee to comply with an applicable requirement.

A. Annual, Semiannual, and Deviation Certification Reporting: This subheading is used to reference the required EGLE Report Certification form (EQP 5736) and EGLE Deviation Report form (EQP 5737) for the annual, semiannual, and deviation certification reporting described in the Reporting conditions of each Source-Wide, Emission Unit and Flexible Group.

There are two options listed in this part:

- Select the first option unless alternative formats have been approved by the AQD District Supervisor.
- Select the second option if alternative formats have been approved by the AQD District Supervisor for the annual, semiannual and deviation certification reporting described under the Reporting conditions. Please note that the approved formats must meet the provisions of R 336.1213(4)(c) and R 336.1213(3)(c)(i), respectively.

B. Other Reporting: This subheading is used for any other required reporting that is not included in A-Annual, Semiannual and Deviation Certification Reporting.

There are two options listed in this part:

- Select the first option for any detailed reporting requirements and insert Source-Wide, the Emission Unit or the Flexible Group from Part B, C, or D that this appendix is supplementing. This sentence must be repeated for each reporting plan in the appendix. If it is used more than once in the same appendix, number or bullet each new item. Lastly, attach the approved formats or describe the reporting requirement details.
- Select the second option if there are no other detailed reporting requirements described in the ROP.

Appendix 9. Acid Rain Permit

Insert the acid rain permit for all Title IV subject facilities.

Other Appendices

The permit writer may create any additional appendices for requirements which need detailed explanations such as preventative maintenance/malfunction abatement plans (PM/MAP) or fugitive dust plans. To include these additional appendices in the table of contents, apply built-in heading styles to the appendix number and name as follows:

- Highlight the new appendix number and name which has been created.
- From the Style menu in the toolbar, scroll to "Heading 2."
- Apply "Arial" and "11" as the font and font size.

- Write a brief sentence identifying the condition and include Source-Wide, the Emission Unit or the Flexible Group which the appendix is supplementing.
- Provide the details of the applicable requirement.

FINAL STEPS

Update the Table of Contents:

1. Position the cursor anywhere in the table of contents you want to update.

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2. Press F9 or right click with the mouse.
3. Do one of the following:
 - To update the page numbers only, select the Update Page Numbers Only option button. Selecting this option retains any direct formatting you have applied to the table of contents.
 - To update the entire table of contents, select the Update Entire Table option button.
4. Choose the OK button.
5. Verify that the Table of Contents appears correctly. If necessary, make format changes within the contents of the ROP itself to adjust what appears in the Table of Contents. To add an entry (e.g. EU that is not showing) to the Table of Contents, highlight what you want to appear and select "Heading 2" in the Style menu in the toolbar. To remove unnecessary entries, change the setting for the corresponding line in the ROP to "Normal" style. The Table of Contents should then appear correctly when updated again. (Repeat Step 3.)

Headers and Footers

For the Working Draft ROP, insert the appropriate draft date in the header, starting on the cover page. The month should be written out in word format (e.g. January 1, 2011 WORKING DRAFT). In the footer, remove the revision date before sending to the company. When the permit reaches the stage where it is sent for public notice, change "WORKING DRAFT" to "DRAFT" in the header and add the new date. Change the header title as the permit develops. Refer to the public participation procedures for more detailed instructions.

Approval Letter

This is a separate document located on the template directory under Microsoft Word→New→AQD→"ROP Initial and Renewal Approval Letter." The letter is to be used only with the final approved ROP. Refer to the Renewable Operating Permit Application Forms for the appropriate items to be used in the approval letter (i.e., Owner Name, Source Name).

- Complete the mailing address of either the Responsible Official for the entire application or each Responsible Official (RO) if there are different sections (multiple ROs can be addressed in one letter or in individual letters). Use the Owner Name and Source Name for the address.
- Insert the ROP Number, Owner Name, Source Name, and Source Location in the appropriate blanks of the first paragraph.
- Complete the name and title of the appropriate staff person or Decision Maker for signature.
- If the permit is sectioned, copy to each Section's Responsible Official. Each Responsible Official will receive a "stand alone" ROP containing the cover pages, Parts A and B plus Parts C - E and the appendices of the Section for which they are responsible. Please refer to Attachment 1 for detailed instructions on Sectioned ROPs.
- Add the due dates for the ROP renewal application.

Right of Entry Pamphlet

When mailing the final approved ROP, be sure to include pamphlet no. EQC5720 (5-2002) titled "ENTRY FOR INSPECTIONS."

Report Certification and Deviation Report Forms

When mailing the final **INITIAL** approved ROP, also enclose ROP reporting forms EQP 5736 & EQP 5737 and instructions.

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

ATTACHMENT 1: ROP Shell Instructions for Sectioned ROPS

The following procedures shall be used as guidance for constructing a Sectioned ROP. The purpose of sectioning an ROP is to simplify certification requirements for a stationary source that has more than one Responsible Official. This is because each Responsible Official must certify compliance with all applicable requirements, including the General Conditions in Part A. As stated in the ROP Application Forms Instructions, stationary sources with multiple physical locations or multiple Responsible Officials may create multiple Sections. A stationary source should not create Sections for separating Emission Units, Flexible Groups, or buildings. Determining whether a ROP should be sectioned should be done on a case by case basis as part of the technical review process.

STEP 1: Should the ROP be sectioned?

Does the stationary source have more than one Responsible Official; or is there a special reason why the ROP should be sectioned?

- If **YES**, the ROP should be sectioned. (Proceed to Step 2.)
- If **NO**, the ROP should not be sectioned. (Use the standard ROP Shell Instructions.)

STEP 2: Are there any stationary Source-Wide applicable requirements?

Stationary Source-Wide requirements apply to the entire stationary source, which includes all Sections. An example of a stationary Source-Wide applicable requirement for a Sectioned ROP is a Source-Wide emission limit such as a Synthetic Minor limit on HAPs. Such a limit would apply to the entire stationary source.

STEP 3: How do I organize a ROP with Sections?

Basically, each Section in the ROP will look like a stand-alone ROP. The exception is that there should only be **one** ROP Certificate (Approval Page), **one** Table of Contents and **one** Authority and Enforceability page for the entire ROP. Since each Responsible Official must certify compliance with all applicable requirements of their Section, including the general conditions in Part A, each Section in the ROP must include a copy of the general conditions in addition to stationary Source-Wide requirements, Emission Unit requirements, Flexible Group requirements, non-applicable requirements and appendices for the Section.

The following table provides details for organizing a Sectioned ROP. The left column gives the order in which the various parts of the ROP should be set-up. The right column provides comments and instructions regarding each part of the ROP.

Parts of the ROP	Comments
Permit Certificate	A Sectioned ROP should only have one Permit Certificate (approval page). NOTE: There should NOT be any reference to the Section # in the header on this page.
Table of Contents	A Sectioned ROP should only have one Table of Contents which encompasses all Sections. NOTE: There should NOT be any reference to the Section # in the header on this page.
Authority & Enforceability	A Sectioned ROP should only have one Authority & Enforceability Page. NOTE: There should NOT be any reference to the Section # in the header on this page.
Section 1	Create a section break at the end of the Authority & Enforceability page. (This page already has a page break at the end, you will keep this break as well.) This is done by clicking on Page Layout, Breaks, Section Break, Next Page. After adding the section break, go into the header and add "Section 1" and the name of the section. In order to do so without affecting the previous header, make sure the "link to previous" button is NOT selected. This will be the page that introduces Section 1 . This page will precede

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

Parts of the ROP	Comments
	the general conditions for Section 1. On this page, you will space down a few lines and type the section number and name of the section in Arial 14 and defined as Heading 1. (This should be the only information on this page.) This will allow the table of contents generator to recognize the section number. You will also have to change the header on the general conditions page. (SEE EXAMPLE 1)
Part A	Each Section should include a complete copy of the general conditions.
Part B	The Source-Wide requirements should be identical for each Section. A copy of Part B should be included in each Section.
Part C	List only the emission units in Section 1. Create a set of conditions for each emission unit in Section 1. If any emission units in Section 1 have the same name as an emission unit in other sections (ex. EUBOILERS) place a -1, -2 etc. behind the name to reflect the section number (ex. EUBOILERS-1, EUBOILERS-2 etc.). If not, do not number emission unit.
Part D	List only the flexible groups in Section 1. Create a set of conditions for each flexible group in Section 1. If any flexible groups in Section 1 have the same name as a flexible group in other sections (ex. FGCOLDCLEANER) place a -1, -2 etc. behind the name to reflect the section number (ex. FGCOLDCLEANER-1, FGCOLDCLEANER-2 etc.). If not, do not number flexible group.
Part E	List only the non-applicable requirements for Section 1.
Appendices	Include the complete set of appendices for each Section. The Appendices for Section 1 should be numbered 1-1, 2-1, 3-1, 4-1, 5-1, 6-1, etc.
Section 2, etc.	Create a section break after the last appendix in Section 1. Follow instructions under Section 1 above for Parts A and B.
Parts C, D, E; Appendices.	Same as above. Use EU{ID}-2, FG{ID}-2 if same name as in other sections, and Appendix 1-2, 2-2, 3-2, etc.

STEP 4: What parts of the Sectioned ROP do I mail to each Responsible Official?

You must send a copy of the Certificate page, the Table of Contents, Authority and Enforceability page, and the appropriate Sections to **each** Section's Responsible Official. Also, copies of the appropriate Sections of the ROP should be sent to any source contacts listed in the ROP application. Remember to follow this procedure when sending copies of the official draft, the proposed, and the final ROP to the company.

EXAMPLE 1: (SEE NEXT PAGE)

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

→ {DATE} WORKING DRAFT → ROP No: MI-ROP-N0677-2008
Expiration Date:
PTI No: MI-PTI-N0677-2008

AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a source-wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or is state only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

Section Break (Next Page)

Insert Section Break here

Make sure link to previous button is not on for header and add Section information to header.

→ {DATE} WORKING DRAFT → ROP No: MI-ROP-N0677-2008
Section 1 Kentwood West → Expiration Date:
PTI No: MI-PTI-N0677-2008

SECTION 1 KENTWOOD WEST

Page Break

This is your section cover page. Arial 14, Heading 1

Insert Page Break here.

→ {DATE} WORKING DRAFT → ROP No: MI-ROP-N0677-2008
Section 1 Kentwood West → Expiration Date:
PTI No: MI-PTI-N0677-2008

A. GENERAL CONDITIONS

Permit Enforceability

→ All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (R³336.1213(5))

You will need to change this header to match sectioned header.

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

ATTACHMENT 2: ROP Shell Formatting & Word Processing Tips

This attachment has been removed. Instead, please see “Word Processing Tips” in the ROP Manual (4.A).

ATTACHMENT 3: Guidance on Completing the Schedule of Compliance

Ask the question, “**Is the source not in compliance with ANY applicable requirements, whether or not there is a Consent Order/ Consent Judgment (CO/CJ)?**” Complete Appendix 2 accordingly.

A. If the source is in compliance with ALL applicable requirements in the ROP

Delete the first option and use the second option from the ROP Shell, which is the paragraph that says that a schedule of compliance is not required. This includes those situations where a source has a CO/CJ for a previous violation that has been resolved. However, if there are conditions in that CO/CJ that need to be included in the ROP (e.g., additional recordkeeping and reporting requirements beyond what is in a related PTI), make sure to add those to the appropriate Source-Wide, Emission Unit or Flexible Group.

B. If there are any applicable requirements for which the source is not in compliance

1. List the specific applicable requirements in the first sentence of the first paragraph (e.g., FGBOILERS, SC III.A.1.1, III.A.1.2, III.A.1.4, III.B.1.2). If the source has not obtained a necessary Permit to Install (PTI), provide the Source-Wide, Emission Unit or Flexible Group followed by “installed without PTI.”

2. Proceed to the Compliance Plan.

- a. Include any narrative details that are necessary to supplement the information to be provided in the Schedule of Compliance table.

For example: “The permittee has certified that this source is in compliance with all applicable requirements at the time of issuance of this ROP except for the following: Table FGBOILERS, (SC III.A.1.1, III.A.1.2, III.A.1.4, III.B.1.2). Dust ‘R Us is required to operate a Continuous Emission Monitor System (CEMS) to monitor nitrogen oxide pollutants on EUBOILER1 and EUBOILER2 (natural gas fired boilers) that are used for process steam and heating purposes. Dust ‘R Us has failed to complete the initial certification of the CEMS, failed to submit a 30-day compliance nitrogen oxides test, and has had excessively high CEMS downtime with respect to the total source operating time.”

- b. Complete the Schedule of Compliance table by answering the following questions:
 - **What condition of the permit is not being complied with?** Provide the appropriate Source-Wide/Emission Unit/Flexible Group ID(s) followed by the actual AR citation(s) (e.g., EUBOILER1, SC I.1, SOURCEWIDE, SC II.2, FGDEGREASERS, SC III.3). If the violation is that the source did not obtain a necessary PTI, enter “installed without PTI.”
 - **What specific requirements are being “violated”?** Provide all of the underlying applicable requirement(s) (e.g., (Rule 201(1), 40 CFR Part 63, Subpart YYY, 40 CFR Part 60, Subpart Db)

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

- **What will be the remedy?** Describe how the source will be brought into compliance. (See example below.)
- **How will the source get there?** Describe the steps necessary to meet the remedial measure. (See example below.)
- **When will they be done?** Provide the individual deadlines for each required action. (See example below.)
- **How will they keep AQD informed?** Provide the deadlines for submission of required reports. Establish deadlines that are consistent with, and cannot be interpreted to override, the ROP semiannual and annual certification report schedules (i.e., make sure that other reporting requirements do not appear to provide for less frequent reporting of the existing compliance certification requirements.)

c. Handling of Consent Order/ Consent Judgments (CO/CJ) or Federal Consent Decrees

- If incorporating a Federal Consent Decree, follow the “Incorporating Permanent Federal Consent Decree Requirements into ROPs” in the ROP Manual (4.K).
- If the source has a CO/CJ with a schedule of increments to bring the source into future compliance with an existing applicable requirement, provide the key steps in the ROP’s Schedule of Compliance. (See example below.)
- If a CO/CJ has not been finalized, a case-by-case decision must be made on what to include.
 - Usually, language should be included that specifies that the source must apply for a revision to the ROP within a certain number of days after a CO/CJ is entered, rather than including more specific provisions. The revision may require an amendment or a modification, with the associated application deadlines, depending on the kinds of provisions expected to be included in the CO/CJ.
 - In cases where the source has resisted agreement to a CO for a long-standing violation, or where management otherwise deems it appropriate, the remedial measure can specify that the source must enter a legally binding administrative consent order agreement by a specified date.
 - If there is new enforcement action for violation(s) of applicable requirements at this source, you may list the steps that the Enforcement Unit agrees are appropriate to require for the source to reach compliance if management deems it appropriate.

Where a condition of the Schedule of Compliance should remain in effect after a CO/CJ is terminated, be sure to include the other appropriate citation(s) in the “Applicable Requirements” column of the table.

Remember, these will be draft conditions and the source will have the option to propose alternative language if desired. It is very possible that the source will not want any of the alternatives, but the ROP must include this Appendix.

Keep the remaining paragraphs up to {OR} and delete the rest of the ROP shell template language for Appendix 2.

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

EXAMPLE 1

Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements except for the following: R 336.1201(1). EUCUPOLA_B, EUCUPOLA_C, and FGMOLDSYSTEM were installed and operated without the necessary Permit to Install (PTI).

A Schedule of Compliance for any applicable requirements that the permittee is not in compliance with at the time of ROP issuance is supplemental to, and shall not sanction non-compliance with, the underlying applicable requirements on which it is based.

The permittee shall adhere to this schedule of compliance and submit the required certified progress reports accordingly.

The following schedule of compliance conforms to the provisions of Rule 119(a) and Rule 213(4).

Emission Unit/ Flexible Group ID and Condition No.	Applicable Requirement(s)	Remedial Measure	Required Action	Milestone Date	Progress Report Deadline
EUCUPOLA_B EUCUPOLA_C FGMOLDSYSTEM - installed without PTI	Rule 201(1)	Obtain Permit to Install and Revise ROP.	Company shall submit acceptable plans and specifications (AQD No. XX-2003 Paragraph 10.A)	June 30, 2003	May 30, 2003
			Company shall provide all additional information requested by AQD to process the pending PTI application (AQD No. XX-2003 Paragraph 10.B)	Within thirty (30) calendar days of a written request from the AQD.	July 30, 2003
			Company shall submit in writing an acceptance of all terms and conditions of the draft permit to the AQD Permit Section Supervisor. (AQD No. XX-2003 Paragraph 10.C)	Within thirty (60) calendar days after receipt of the draft revised PTI permit conditions.	August 30, 2003
			Company shall submit application to modify the ROP in accordance with the requirements of R 336.1216.	Within seven (7) calendar days of the effective date of the PTI.	

**INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT
TO CREATE A RENEWABLE OPERATING PERMIT**

Emission Unit/ Flexible Group ID and Condition No.	Applicable Requirement(s)	Remedial Measure	Required Action	Milestone Date	Progress Report Deadline
EUCUPOLA_B, SC VI.2 EUCUPOLA_C, SC VI.2 FGMOLDSYSTEM, SC VI.2	Rule 213(3)	Maintain adequate recordkeeping	Company shall keep records on the processes in accordance with attached Exhibits A and B. These records shall be made available to the AQD upon written or verbal request. (AQD No. XX- 2003, Paragraph 11).	NA	NA
FGMISTELIM	R 336.1201	Obtain Permit to Install or provide justification for exemption for permit exemption status for FGMISTELIM	Company shall submit Permit to Install application or sufficient documentation to justify exemption from Permit to Install requirement.	March 15, 2003	
			Company shall provide all additional information requested to process the pending PTI permit application or permit exemption status.	Within thirty (30) calendar days of a written request from the AQD.	
			Company shall submit in writing an acceptance of all terms and conditions of the draft permit, if applicable, to the AQD Permit Section Supervisor.	Within thirty (60) calendar days after receipt of the draft revised PTI permit conditions	.
			If a PTI is required, company shall submit application to modify the ROP in accordance with the requirements of R 336.1216.	Within seven (7) calendar days of the effective date of the PTI.	

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

EXAMPLE 2

Schedule of Compliance

Emission Unit/ Flexible Group ID & Condition No.	Applicable Requirement(s)	Remedial Measures	Required Action	Milestone Date	Progress Report Deadline
Source-Wide – GC 12	R 336.1901	Installation and operation of ambient air particulate sampler for the purpose of self-monitoring and not for demonstrating compliance with NAAQS. Evaluate operations/initiate corrective actions if particulate fallout samples indicate excessive fallout.	After three (3) months of monitor operation and sample analysis, permittee shall submit a report detailing results and a plan describing additional remedial actions to be taken in relation to sample results.	October 1, 2000	Quarterly progress reports to be submitted until 1/1/2002. Thereafter, the requirement to submit quarterly progress reports may be terminated upon demonstration by the facility that the fallout problem has been resolved, with concurrence of AQD. Reports shall detail on-going actions taken to resolve particulate fallout. Report due January 1, 2001 and every quarter thereafter.

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

EXAMPLE 3

... in compliance except for the following: R 336.1201(3), R 336.1702(a)...

Schedule of Compliance

The references below are technically correct, as the Source-Wide PTI is the only PTI that exists within the ROP, and thus would be the PTI to be modified (obviously, the PTI issued would have a "normal" PTI number)

Emission Unit/ Flexible Group ID and Condition No	Applicable Requirement(s)	Remedial Measures	Required Action	Milestone Date	Progress Report Deadline
EUCOREFAB SC I.B.1.a SC I.B.1.b SC II.B.1 SC VI.1	R 336.1201(3), R 336.1702(a)	Modification to Source-Wide Permit to Install MI-PTI-SRN- 2003 for increase of stack diameter, increase in VOC limit & removal of requirement to use specific product in process.	An application requesting modification of Source-Wide Permit to Install MI-PTI-SRN- 2003 will be submitted by this date. It will contain all appropriate impacts and limit calculations. The first day of every month until the Permit to Install modification is issued, a written report shall be submitted explaining what stage the permit development is in. All information requests from the AQD, regarding permit development, shall be promptly responded to within the stipulated time frame. If a Permit to Install is not issued by this date, a compliance plan with a timeline must be submitted describing what alternate actions will be taken to come into compliance with the existing permit.	December 1, 2003 August 1, 2003 December 1, 2003	First of every month

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

ATTACHMENT 4: Special Conditions for Emission Units Subject to Rule 801

Background

What is the purpose of Rule 801?

This rule is to regulate the NO_x emissions during the ozone control period (which is May 31, 2004 through September 30, 2004, and the period of May 1 through September 30 each subsequent and prior year) for subject facilities and/or emission units.

Who is subject?

Applicability: Any stationary source of NO_x that is not defined as a NO_x budget source in Rule 803. Primarily any source of NO_x in the UP and in the counties of Alcona, Alpena, Antrim, Arenac, Benzie, Charlevoix, Cheboygan, Clare, Crawford, Emmet, Gladwin, Grand Traverse, Huron, Iosco, Kalkaska, Lake, Leelanau, Manistee, Mason, Missaukee, Montmorency, Ogemaw, Osceola, Oscoda, Otsego, Presque Isle, Roscommon, Wexford. (This rule applies to sources in USEPA's "course grid" modeling area and to any sources in the "fine grid" that are not subject to Rules 802-816.)

Rule 801(2): Fossil fuel fired electric generating units that have a potential to emit of more than 25 tons of NO_x during each ozone control period and have a name plate capacity of 25 MW or more. The only exceptions are those units that are subject to a FIP or Section 126 petition and those that are subject to Rule 801(14).

Rule 801(4): Fossil fuel fired emission units that have a potential to emit of more than 25 tons of NO_x during each ozone control period and have a maximum rated heat input capacity of more than 250 MMBTU/hour must comply with the requirements for each category as specified in the following subrules:

- (a) Fossil fuel fired electric generating units that have a name plate capacity of less than 25 MW.
- (a) Fossil fuel fired boiler or process heater
- (b) Gas fired boiler or process heater that fires gaseous fuel which contains more than 50% hydrogen.
- (c) Stationary internal combustion engines.
- (d) Cement kilns.
- (e) Stationary gas turbines unless subject to 40 CFR 60 Subpart GG.
- (f) Emission units that are subject to Rule 801 but are not subject to 801(2) and 801(4)(a) through (f).

(See ROP Language on the following page for condition wording for each affected source.)

Rule 801(14): Provisions of Rule 801 do not apply to any unit(s):

1. That is subject to any NO_x standard that has been promulgated in FIP under Section 110(c) of the CAA, required under Section 126 of the CAA, or promulgated in a federal regulation under 40 CFR Part 51 or Part 60 and which are equally stringent or more stringent than this rule.
2. Subject to any other rule in Part 8.
3. A peaking unit.

Compliance Dates

The compliance date in this rule may be extended up to 2 years if the owner or operator makes an acceptable demonstration to the AQD that additional time is necessary to avoid disruption of the energy supply in the state or to comply with the provisions of Rule 801.

If you have any questions concerning this rule and whether a source is subject please contact Brian Carley at 517-416-4631 or at carleyb@michigan.gov.

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

ROP language for emission unit(s) subject to Rule 801: Select all that are appropriate:

EMISSION LIMIT(S) requirements

For facilities subject to Rule 801(2)

The emission unit shall meet the least stringent of a utility system-wide average NOx emission rate of 0.25 lbs/MMBTUs heat input or an emission rate based upon a 65% reduction of NOx from 1990 levels. The facility shall comply with this emission limit during the ozone control period.¹ **(R 336.1801(2)(b))**

For facilities subject to Rule 801 (4)(a) and (b)

The emission unit shall not exceed the NOx emission limit specified in Table 81. Compliance with the emission limit shall be based upon the pounds of NOx emitted per million BTU averaged over the ozone control period. See Appendix 7.¹ **(R 336.1801(4))** *{If the unit(s) can only use a specific fuel, you can put that in instead of referencing Table 81. If the facility uses multiple fuels put Table 81 in Appendix 7}*

For facilities subject to Rule 801 (4)(c) through (f) {See specific subrule for emission limit}

The emission unit shall not exceed the NOx emission limit of -----. Compliance with the emission limit shall be based upon the NOx emissions that occurred during the ozone control period.¹ **(R 336.1801(4)())**

For facilities subject to Rule 801(4)(g)

The facility shall implement the NOx control program approved by AQD. See Appendix ().¹
(R 336.1801(4)(g))

TESTING/SAMPLING and/or MONITORING/RECORDKEEPING requirements

For facilities subject to Rule 801(2)

The permittee shall monitor and record the NOx emissions from the emission unit with a continuous emission monitoring system in accordance with the provisions of R 336.1801(11). All data shall be kept on file for a period of five years and made available to the AQD upon request. *{They may also use an alternate method described in 40 CFR 60 or 75 or a method currently in use that is acceptable to the department, including methods contained in existing permits.}*¹ **(R 336.1801(7))**

For facilities subject to Rule 801(4)

The permittee can measure oxides of nitrogen emissions in one of three ways:

A. Performance Testing

{CHOOSE ONE OR THE OTHER}

For emission units currently in service: During the ozone control period, the permittee shall conduct an initial performance test using EPA Method 7 or other method approved by AQD not later than 180 days after the compliance deadline.¹ **(R 336.1801(9)(a))**

OR (For emission units not in service on or after the compliance deadline.):

The permittee shall conduct an initial performance test using EPA Method 7 or other method approved by AQD during the ozone control period of the year _____.¹ **(R 336.1801(9)(a))**

{ALWAYS INCLUDE THE FOLLOWING WITH PERFORMANCE TESTING}

After the initial performance test, the permittee shall conduct a compliance performance test each ozone control period or according to the schedule in Appendix 3.¹ **(R 336.1801(9)(b))**

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

{ADD THE FOLLOWING SCHEDULE}

Appendix 3. Monitoring Requirements

After 2 consecutive ozone control periods in which the emission unit demonstrates compliance, the permittee shall conduct performance tests at least once every 2 years during the ozone control period.¹ **(R 336.1801(9)(b)(i))**

After a total of 4 consecutive ozone control periods in which the emission unit demonstrates compliance, the permittee shall conduct performance tests at least once every 5 years during the ozone control period.¹ **(R 336.1801(9)(b)(ii))**

If an emission unit is in noncompliance at the end of the ozone control period, the permittee shall conduct a compliance performance test each ozone control period, but can again elect to use the alternative schedule specified in R 336.1801(9)(b).¹ **(R 336.1801(9)(c))**

B. The permittee shall monitor and record the NO_x emissions of the emission unit with a continuous emission monitoring system in accordance with the provisions of R 336.1801(11). All data shall be kept on file for a period of five years and made available to the AQD upon request.¹ **(R 336.1801(8)(b))**

C. According to a schedule and using a method acceptable to the department.¹ **(R 336.1801(8)(c))**

REPORTING requirements

If doing a performance test:

The permittee shall submit 2 copies of the performance test to the department within 60 days of the completion of the testing.¹ **(R 336.1801(9)(d))**

All subject facilities:

The permittee shall submit a summary report, in an acceptable format, to the department within 60 days after the end of the ozone control period. The report shall include the following information:

- A) The date, time, magnitude of emissions and emission rate where applicable, of the specified emission unit or utility system.
- B) If there are any exceedances of the allowed emissions or emission rates in the ozone control period, the cause, if known, and any corrective action taken.
- C) The total operating time of the emission unit during the ozone control period.
- D) For continuous emission monitoring systems, system performance information, including the date and time of each period during which the continuous monitoring system was inoperative, except for zero and span checks, and the nature of the system repairs or adjustments. When the continuous monitoring system has not been inoperative, repaired, or adjusted, the information shall be stated in the report.¹ **(R 336.1801(12))**

For peaking unit(s) subject to Rule 801(14)

The owner or operator shall retain records of capacity for a period of 5 years demonstrating that the unit meets the definition of peaking unit. The unit shall become subject to Rule 801 on January 1 of the year following failure to meet the peaking unit definition.¹ **(R 336.1801(14))**

INSTRUCTIONS FOR USING THE ROP SHELL DOCUMENT TO CREATE A RENEWABLE OPERATING PERMIT

Appendix 7. Emission Calculations (Appendix 7)

For facilities subject to Rule 801(2)

To calculate the utility system-wide average emission rate from all units owned or operated by a utility that is subject to Rule 801(2), the permittee shall take the sum of the mass emissions from the subject units which occurred during the ozone control period divided by the sum of the heat input from the subject units which occurred during the ozone control period.

To demonstrate compliance with the percent reduction requirements of Rule 801(2), the permittee shall provide calculations showing that the utility system average emission rate during the compliance ozone control period has been reduced below the 1990 ozone control period average emission rate by the applicable percent reduction listed in Rule 801(2). The 1990 ozone control period average emission rate from all units owned or operated by a utility that is subject to Rule 801(2) is the sum of the mass emissions which occurred during the 1990 ozone control period divided by the sum of the heat input which occurred during the 1990 ozone control period.

Table 81

Boilers and process heaters with heat input capacity of 250 million Btu or more oxides of nitrogen (NO _x) emission limitations (pounds NO _x per million Btu of heat input averaged over the ozone control period)	
Fuel type	Emission limit
Natural gas	0.20
Distillate oil	0.30
Residual oil	0.40
Coal (1) Coal spreader stoker (2) Pulverized coal fired	0.40 0.40
Gas (other than natural gas) ¹	0.25
<p>For units operating with a combination of gas, oil, or coal, a variable emission limit calculated as the heat input weighted average of the applicable emission limits shall be used. The emission limit shall be determined as follows:</p> <p>Emission limit = $a(0.20) + b(\text{applicable oil limit}) + c(\text{applicable coal limit}) + d(0.25)$</p> <p>Where:</p> <p>a = Is the percentage of total heat input from natural gas</p> <p>b = Is the percentage of total heat input from oil</p> <p>c = Is the percentage of total heat input from coal</p> <p>d = Is the percentage of total heat input from gas (other than natural gas)</p>	

¹This may include a mixture of gases. In this case, natural gas may be part of the mixture.

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ATTACHMENT 5: Incorporating the CAM Plan into an ROP

The stationary sources that are required to obtain an ROP may also be required to submit a Compliance Assurance Monitoring (CAM) Plan with either their initial or renewal ROP. Stationary sources may be subject to the CAM Rule if they are required to obtain an ROP and have an emission unit for which all of 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) for the applicable pollutant
- The emission limitation or standard does not meet a CAM exemption

The CAM Rule (40 CFR Part 64) specifies which elements should be included in the emission unit table in the ROP. The conditions below specify which elements may be from the CAM Plan and which elements come directly from the CAM Rule (generally 40 CFR 64.6). The CAM Rule should be consulted along with these instructions.

This attachment should be used in conjunction with the "[ROP CAM Example Table](#)" document. This document contains template language and monitoring conditions for control devices. It is recommended to use the above document for more precise language.

Other information about CAM can also be found in the [CAM Fact Sheet](#) available at the [AQD CAM website](#). For questions concerning CAM please contact the AQD CAM Specialist. All CAM plans and CAM language in draft Staff Reports and the Working Draft ROP need to be sent to the AQD CAM Specialist for review prior to company review.

FOR AUTO AND LIGHT TRUCK COATING OPERATIONS CONTACT ROBERT BYRNES AT 517-275-0439 OR BYRNESR@MICHIGAN.GOV. FOR PRINTING FACILITIES SEE CHAPTER 4 AND APPENDIX D OF [TECHNICAL SUPPORT DOCUMENT FOR TITLE V PERMITTING OF PRINTING FACILITIES](#).

IF A FACILITY HAS PROPOSED PRESUMPTIVELY ACCEPTABLE MONITORING IN THE CAM PLAN, THEN THE MONITORING NEEDS TO BE VERIFIED THAT IT MEETS THE REQUIREMENTS IN THE NSPS OR NESHAP (SEE CAM FACT SHEET). IF IT DOES, THEN THE MONITORING CAN BE USED FOR CAM IN THE ROP. USE APPROPRIATE CAM RULE CITATIONS. FOR MONITORING LANGUAGE, USE UNDERLYING APPLICABLE REQUIREMENTS FROM 40 CFR PART 64 AND FROM THE NSPS OR MACT. ADD OTHER CAM TEMPLATE LANGUAGE FROM THIS DOCUMENT TO THE ROP TABLE. THIS INCLUDES DEFINING A CAM EXCURSION, CAM REPORTING, AND QA/QC REQUIREMENTS.

In the ROP, identify the table with the emission unit subject to CAM. This table should include the following as applicable requirements if appropriate. They can be combined with other requirements. The language should be adapted to fit the emission unit. The recommended section in the ROP table where the conditions may be inserted is given below. The CAM Plan does not need to be attached as an Appendix to the ROP.

A. ADD CONTROL DEVICE PARAMETERS

The ROP should have a condition stating the control device parameters to be measured (pressure drop, opacity, voltage, VOC removal efficiency, scrubber liquid pH, etc.) as defined in the CAM Plan, including the method of measuring or recording, and the appropriate ranges or conditions that have been chosen for the parameters. The measuring or recording device should be identified. For VOC control devices,

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monitoring for the capture system should be included. **(40 CFR 64.6(c)(1)(i) and (ii)) FROM CAM PLAN** (see ROP CAM Example Table)

Example ROP condition, for Section VI. Monitoring/Recordkeeping:

The permittee shall continuously measure the pressure drop and record the pressure drop once per shift as an indicator of proper operation of the dust collector. The indicator range is a pressure drop of 1 - 6" WC. **(40 CFR 64.6(c)(1)(i) and (ii))**

B. ADD PERFORMANCE CRITERIA, QA/QC PROCEDURES

The ROP should have a condition stating the performance criteria used to obtain representative data. This includes the data collection frequency, data averaging methods, the minimum data availability requirement for the averaging periods in a reporting period, and appropriate QA/QC procedures. This may be combined with the recordkeeping requirements or used as a separate condition. **(40 CFR 64.6(c)(1)(iii)) FROM CAM PLAN** (see ROP CAM Example Table)

Example ROP condition for Section VI. Monitoring/Recordkeeping:

The permittee shall utilize pressure drop as an indicator of proper operation of the baghouse. The indicator range defining proper operation is 1 – 6" WC. The pressure gage shall be calibrated at least annually. **(40 CFR 64.6(c)(1)(i), (ii), and (iii))**

C. DEFINE EXCURSION OR EXCEEDANCE

The ROP should state an indicator range at which an excursion or exceedance will be defined. Check to see if an excursion/exceedance level has already been defined in a Permit to Install. To define an excursion, the ROP may either include the specific value(s) or condition(s) at which an excursion will occur or specific procedures that will be used to establish that value or condition. If the latter, then the permit shall specify procedures for the establishment or reestablishment of the excursion value. An excursion is a departure from an indicator range. An exceedance is an indication that an emission limitation or standard has not been met. **(40 CFR 64.6(c)(2)) FROM CAM PLAN** (see ROP CAM Example Table)

Example ROP Condition for Section VI. Monitoring/Recordkeeping:

An excursion is defined as a departure from the indicator range of 1 – 6" WC. **(40 CFR 64.6(c)(2))**

D. ADD TEMPLATE LANGUAGE #1

A condition stating the obligation to conduct the monitoring and satisfy the requirements specified in 40 CFR 64.7 through 64.9. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c)) FROM CAM RULE** (see ROP CAM Example Table)

Example ROP condition for Section VI. Monitoring/Recordkeeping:

Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for 40 CFR Part 64 compliance, including data averages and calculations or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, in frequent, not reasonably preventable failure

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of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. **(40 CFR 64.6(c)(3), 40 CFR 64.7(c))**

E. ADD IF TESTING, INSTALLATION, OR FINAL VERIFICATION OF OPERATIONAL STATUS IS REQUIRED

If the monitoring proposed by the permittee requires installation, testing or final verification of operational status, include an enforceable schedule in the ROP with appropriate milestones for installation, testing or final verification of operational status of equipment. **(40 CFR 64.4(e), 40 CFR 64.6(d)) FROM CAM PLAN** (see ROP CAM Example Table)

F. ADD IF CAM PLAN IS BEING REQUESTED IN THE ROP

If AQD determines that the submitted CAM plan is inadequate, a revised plan should be requested. If a revised CAM Plan is not received before the ROP is issued, the AQD should include appropriate monitoring in the ROP if necessary. According to the CAM Rule the submittal date for the revised CAM Plan should not exceed 180 days after the ROP is issued. **(40 CFR 64.6(e)(2)) FROM CAM RULE** (see ROP CAM Example Table)

Example ROP condition for Section IX. Other Requirements:

The permittee shall submit a revised CAM Plan within 180 days of the issuance of the ROP. **(40 CFR 64.6(e)(2))**

G. ADD TEMPLATE LANGUAGE #2 AND CORRECTIVE ACTION IN RESPONSE TO AN EXCURSION OR EXCEEDANCE

The ROP should specify corrective actions to be taken in response to an excursion or exceedance (40 CFR 64.7(d)). Include the statement: "Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions)." Then include specific actions in regard to the control device. **(40 CFR 64.7(d)) FROM CAM RULE** (see ROP CAM Example Table)

Example ROP condition for Section VI. Monitoring/Recordkeeping:

Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). See Appendix 3 for the corrective action plan. **(40 CFR 64.7(d))**

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H. ADD TEMPLATE LANGUAGE #3

This should be added to the ROP in regard to the documentation of the need for improved monitoring. A statement that the permittee shall promptly notify EGLE of the need to modify the monitoring plan if it is found to be inadequate and submit a proposed modification to the ROP if necessary. **(40 CFR 64.7(e))**
FROM CAM RULE (see ROP CAM example Table)

Example ROP condition for Section IX. Other Requirements:

If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. **(40 CFR 64.7(e))**

I. ADD TEMPLATE LANGUAGE #4

A general statement should be added for compliance with the CAM Rule. **(40 CFR Part 64)**
(see ROP CAM Example Table)

Example ROP condition for IX. Other Requirements:

The permittee shall comply with all applicable requirements of 40 CFR Part 64. **(40 CFR Part 64)**

J. ADD TEMPLATE LANGUAGE #5

This should be added to the ROP in regard to proper maintenance of the monitoring system. A statement that the permittee shall maintain the monitoring system, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **(40 CFR 64.7(b))** **FROM CAM RULE**
(see ROP CAM Example Table)

Example ROP condition for Section VI. Monitoring/Recordkeeping:

The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment. **(40 CFR 64.7(b))**

K. ADD TEMPLATE LANGUAGE #6

A general statement should be added for recordkeeping requirements: **FROM CAM RULE**
(see ROP CAM Example Table)

Example ROP condition for Section VI. Monitoring/Recordkeeping:

The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) and any activities undertaken to implement a QIP, and other information such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions. **(40 CFR 64.9(b)(1))**

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L. ADD OPTIONAL QIP LANGUAGE

Quality Improvement Plan (QIP). *Optional.* Generally, this should be included only if problems with the monitoring is anticipated. Please refer to 40 CFR 64.8 and/or Section 2.4 of the CAM Technical Guidance Document at the AQD CAM website mentioned above. **FROM CAM RULE** (see ROP CAM Example Table)

Example ROP condition for Section IX. Other Requirements:

The permittee shall submit a QIP if 6 excursions occur in any 3-month period. **(40 CFR 64.8(a))**

M. ADD REQUIRED REPORTING CONDITIONS

Reporting requirements as required for all ROPs (semiannual). Reporting forms are available on the AQD CAM website. **FROM CAM RULE** (see ROP CAM Example Table)

In Section VII. Reporting, of the ROP table containing CAM requirements, add the following language:

4. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances. **(40 CFR 64.9(a)(2)(i))**
5. Each semiannual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(40 CFR 64.9(a)(2)(ii))**
6. Each semiannual report of monitoring and deviations shall include a description of the actions taken to implement a QIP during the reporting period (if appropriate). If a QIP has been completed the report shall include documentation that the plan has been implemented and if it has reduced the likelihood of excursions or exceedances. **(40 CFR 64.9(a)(2)(iii))**

Note: If there is not a monitor or a QIP, the language for these (5. OR 6.) may be deleted.