

Guidance for Supervisor Review of ROPs

1. What staff should provide

- ROP and Staff Report
- Technical Review Notes
- Application
- PTIs issued since last ROP renewal
- Any outstanding modification requests

Additional “good to have” items

- Latest inspection report
- Previous ROP (and staff report)
- Mark up of any applicable MACT standards
- List of PTIs incorporated into the ROP (from ROP-Lookup)

2. Reviewing the Staff Report (before, during, and after the ROP)

- Review the regulatory discussion – use the staff report instructions as a guide.
 - Make sure it contains all regulations listed in MACES.
- Make sure general information and emissions data is updated.
- Make sure any new PTIs are discussed.
- Make sure all MACTs/Area MACTs in the ROP are mentioned in the staff report.
- Make sure all changes to the ROP are documented and explained.
- Make sure all basic info from application is correct (source info, contacts, exempt devices, etc).
- Make sure that the staff report provides a summary of the requirements and EUs/FGs that are listed in the ROP.
- Make sure that all significant enforcement actions (past and recent) are discussed.
- Any monitoring that is unique or different or that has changed should be discussed.
- Compare it to the previous staff report.
- Make sure all CAM subject emission units are discussed.

3. Reviewing the ROP

- Review issues that were brought up during pre-application meeting to ensure that they have been addressed.
- Compare the draft to the current ROP, the company mark up, staff report and technical review notes to help determine which areas to focus on.
- Review EU summary table to make sure all EUs are found in the permit either as an EU table or part of an FG.
- Make sure that all EUs and FGs in the ROP are in the appropriate summary tables and names and descriptions match.
- Review each EU for the following
 - Verify that description is clear and concise and any control device is listed.
 - Review monitoring/testing methods for emission limits to see that they make sense and that the monitoring method in the emission limit table points to the correct SC.
 - Review process/operational conditions for any need to have a method of compliance in the monitoring section.

- If there is monitoring of operational parameters (i.e. pressure drop, temperature), make sure that there is a requirement to install the monitor under design/equipment and a range is listed or referenced in a MAP under process/operational.
- Make sure that there is sufficient monitoring/testing/recordkeeping to verify compliance with each emission limit. Any required testing should include continued (every 5 years) testing. Sometimes this will include 5 year testing AND some type of operational monitoring.
- Determine if any Rule 213 testing requirements should be added (with retesting every 5 years).
- Determine if any emissions are CAM subject and if so, that all CAM requirements are included (use “Incorporating a CAM plan into an ROP” in the ROP Manual (F.6)). Make sure that the AQD CAM Specialist has reviewed the CAM conditions.
- If subject to NSPS, MACT, NESHAP – make sure applicable requirements are included in enough detail to determine compliance (and are understandable!). Check if a template table exists and if it was used.
- Review footnotes and make sure they are used appropriately. Rule 213(3) **shouldn’t** have a footnote. Also, there shouldn’t be both PTI (i.e. Rule 205, 201, etc) UARs and Rule 213.
- Review UARs to make sure they have been correctly cited.
 - Check the UARs to ensure they are appropriate for the SC.
 - Check the rule book or CFR for UARs which appear incorrect or inappropriately used.
- After reviewing each EU, compare EUs to each other for consistency in language and compare against current ROP and any new PTIs.
- For new EUs (new PTIs), compare the draft to the PTI and make sure that the footnotes are appropriate.
- As new issues are found in EU tables, go back to previous tables to check for the issue there.
- Check any template table where appropriate to ensure the most up to date template is being used.
- Review any “Test Protocol” citations used for Time Period/Operating Scenario in the Emission Limits table. Replace as appropriate.
- Make sure no GC 13 citations are the only “Monitoring/Testing Method” listed in the Emission Limits table.
- Make sure Appendices have specific information if “See Appendix X” is used.
- Make sure special condition language from PTIs are updated (or removed) if dates or tasks have passed or been completed (i.e., submit MAP within 120 days).
- Check equipment installation dates and make sure applicable requirements are correct (i.e., new vs existing).
- Make sure “Modification Date” listed in EU summary table is the date of actual equipment modification, not just a PTI modification.
- Make sure changes in the exemptions due to Part 2 rule revisions are reflected in the ROP, especially the Rule 290 table, and in the exempt equipment listings in the staff report.
- Make sure the general conditions and other boiler plate language was replaced in the mark-up ROP received from the company (if the company mark-up was used as a starting draft).