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

FITT Procedures

for

ROP Public Participation

Revised

August 17, 2022

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FITT Procedures for Uploading ROP documents to the Internet

Overview

During the course of the public participation process and review of ROP documents by EPA and affected states, several documents will need to be made available on the internet. Most of the documents will be posted for the general public to access. The application is posted mainly for EPA to review, rather than the general public.

Staff Procedure

When the secretary has finalized the various ROP documents at points throughout the public participation process, they or the permit writer will notify the FITT representative of the locations and names of the documents to be placed on the FTP site.

The FITT representative will make sure the documents are saved as both Word documents (.doc) and as .pdf documents, readable in Adobe Acrobat. Initial and Renewal applications and any plans will be saved as .pdf only. It is important to check each .pdf document after creating it to ensure that there are no blank pages added or odd page breaks in the conversion. Either the district secretary or the FITT representative can do this. The documents should be named as follows:

<u>**Initial/Renewal ROP Documents**</u>

Upon Receipt of Administratively Complete Application

Initial ROP Application	SRN ROP Initial App {date received}.pdf
Renewal ROP Application	SRN ROP Renewal App {date received}.pdf
Pending Modification Applications	SRN {type of modification} App {application number}.pdf

30-Day Public Comment Period

Draft ROP	SRN Draft {MM-DD-YY}.doc and SRN Draft {MM-DD-YY}.pdf
Staff Report	SRN Staff Report {MM-DD-YY of Draft ROP}.doc and SRN Staff Report {MM-DD-YY of Draft ROP}.pdf
Plans (i.e., MAP, Nuisance Minimization, Fug. Dust, O&M, PMP, SSM, etc.)	SRN {Name of Plan}.pdf
Public Notice	SRN Public Notice {MM-DD-YY of Draft ROP}.doc and SRN Public Notice {MM-DD-YY of Draft ROP}.pdf

45-Day EPA Review

Proposed ROP	SRN Proposed {MM-DD-YY}.doc and SRN Proposed {MM-DD-YY}.pdf
Staff Report	SRN Staff Report {MM-DD-YY of Proposed ROP}.doc and SRN Staff Report {MM-DD-YY of Proposed ROP}.pdf
Plans (i.e., MAP, Nuisance Minimization, Fug. Dust, O&M, PMP, SSM, etc.)	SRN {Name of Plan}.pdf

Final ROP

Final ROP	SRN Final {MM-DD-YY}.doc and SRN Final {MM-DD-YY}.pdf
Staff Report	SRN Staff Report {MM-DD-YY of Final ROP}.doc and SRN Staff Report {MM-DD-YY of Final ROP}.pdf
Plans (i.e., MAP, Nuisance Minimization, Fug. Dust, O&M, PMP, SSM, etc.)	SRN {Name of Plan}.pdf

Reopening ROP Documents

30-Day Public Comment Period

REO Draft ROP	SRN REO Draft {MM-DD-YY}.doc and SRN REO Draft {MM-DD-YY}.pdf
Staff Report	SRN Staff Report {MM-DD-YY of REO Draft ROP}.doc and SRN Staff Report {MM-DD-YY of REO Draft ROP}.pdf
(i.e., MAP, Nuisance Minimization, Fug. Dust, O&M, PMP, SSM, etc.)	SRN {Name of Plan}.pdf
Public Notice	SRN REO Public Notice {MM-DD-YY of REO Draft ROP}.doc and SRN REO Public Notice {MM-DD-YY of REO Draft ROP}.pdf

45-Day EPA Review

Proposed Permit	SRN REO Proposed {MM-DD-YY}.doc and SRN REO Proposed {MM-DD-YY}.pdf
Staff Report	SRN Staff Report {MM-DD-YY of REO Proposed ROP}.doc and SRN Staff Report {MM-DD-YY of REO Proposed ROP}.pdf
Plans (i.e., MAP, Nuisance Minimization, Fug. Dust, O&M, PMP, SSM, etc.)	SRN {Name of Plan}.pdf

Final ROP

Final Permit	SRN Final {MM-DD-YY}.doc and SRN Final {MM-DD-YY}.pdf
Staff Report	SRN Staff Report {MM-DD-YY of Final ROP}.doc and SRN Staff Report {MM-DD-YY of Final ROP}.pdf
Plans (i.e., MAP, Nuisance Minimization, Fug. Dust, O&M, PMP, SSM, etc.)	SRN {Name of Plan}.pdf

All applications (initials and renewals using the WORD templates) will be saved to your district R drive under the ROP folder for that source and named SRN ROP Initial App {date received}.pdf or SRN ROP Renewal App {date received}.pdf. The pdf version of the application should also be uploaded to the FTP site <u>after it is determined administratively complete</u>. A new SRN folder will have to be created on the FTP site (see link below) for any INITIAL ROP applications. Also, an email which includes the SRN, Name of the Company, and County will need to be sent to Kelly Orent at orentk@michigan.gov so it can be added to the ROP List.

The FITT representative will copy the applicable files to the network server (also known as the FTP site) at https://www.egle.state.mi.us/aps/downloads/ROP/pub_ntce as specified in the ROP Public Participation Procedures prior to the beginning of public comment, prior to EPA review, and upon issuance of the ROP.

If you are processing a renewal ROP, the current final ROP and Staff Report will already be posted on the FTP site. ***These should remain on the FTP site until the renewal ROP is issued***.

PUBLIC COMMENT PERIOD
Documents to be uploaded at the start of the public participation process are: the Public Notice, Draft ROP, the Staff Report and any management and work practice plans required in the ROP (check with staff person on this if no plans are given to you to post). The draft ROP must be password protected for tracked changes. See the instructions at the end of these procedures for assistance. The application will need to be uploaded again if revisions were made after it was initially submitted. The file name on the Staff Report must include the same date as that of the Draft ROP. These MUST BE available on the

Internet NO LATER THAN the day that the 30-day Public Comment Period BEGINS (and preferably BEFORE the Public Comment Period begins).

EPA REVIEW
The documents to be uploaded before the start of the EPA review period will include the Proposed ROP, the updated Staff Report and any management and work practice plans required in the ROP. Any plans that were posted at 30-day should remain posted. If you find plans that were not posted at 30-day, please send a note to Kelly Orent so she can ensure they get posted. The proposed ROP must be password protected for tracked changes. See the instructions at the end of these procedures for assistance. The file name on the Staff Report must be updated to include the same date as that of the Proposed ROP. The 45-day clock WILL NOT BEGIN until these documents are available on the Internet **and** EPA has been notified by way of an email from the District Supervisor. The Draft ROP, the Staff Report (30-day version), and the Public Notice should be removed from the FTP site when the Proposed ROP, and the updated Staff Report are uploaded. If the plans have not been changed from the public comment version, they should be left on the FTP site for the EPA comment period. If they have changed, the new version should be posted for the EPA comment period.

FINAL DOCUMENTS
The final documents to be uploaded include the Final ROP and the final Staff Report. The Final ROP must be password protected to prevent turning off track changes for the next round of renewals. See the instructions at the end of these procedures for assistance. The file name on the Staff Report must include the same date as that of the Final ROP. When the Final ROP and the final Staff Report are uploaded, the Proposed ROP, the Staff Report (45-day version), and ROP application (and any modification applications that were addresseed in the renewal) should be removed from the FTP site. **Do not remove the plans; they need to remain on the FTP site.**

FITT Back–up
The back-up district FITT representative is trained to perform uploads for the district in the absence of the primary FITT representative. ROP Public Notice is very time-dependent and cannot always wait if the FITT representative is not available. Second back-up for each district is Kelly Orent.

Special Note Concerning Staff Reports for ROPs in Process
It is important to make sure that only the most current version of the Staff Report for the ROP in process is posted on the FTP site. Each time the Staff Report is updated during the public participation process and posted on the FTP site, the previously posted version should be removed. The current Staff Report for the active ROP should remain on the FTP site until the ROP in process has been finalized.

Special Note Concerning FTP site

The network automatically creates a subdirectory titled "vti_cnf" beneath the subdirectories where files are placed. At one time, this was where a "back-up" copy was created automatically as an artifact of the system. Occasional glitches occurred where vti_cnf versions were displaying instead of the newer documents. This problem has not reoccurred in years, so the vti_cnf subdirectories may be completely ignored.

FITT Check List for Initial & Renewal ROPs

COMPANY NAME:_____   **SRN:**_____

<u>Upon Receipt of Administratively Complete ROP Application</u>

☐   ___/___/_____   Upload ROP Application {SRN ROP Initial App {date received}.pdf or SRN ROP Renewal App {date received}.pdf} and any pending modification applications

<u>30 Day Public Comment Period</u>

☐   ___/___/_____   Convert SRN Draft {MM-DD-YY}.doc to .pdf

☐   ___/___/_____   Password Protect SRN Draft {MM-DD-YY}.doc for Tracked Changes

☐   ___/___/_____   Convert SRN Staff Report {MM-DD-YY of Draft ROP}.doc to .pdf

☐   ___/___/_____   Convert SRN {Name of Plan}.doc to .pdf

☐   ___/___/_____   Convert SRN Public Notice {MM-DD-YY of Draft ROP}.doc to .pdf

☐   ___/___/_____   Upload SRN Draft {MM-DD-YY}.doc & SRN Draft {MM-DD-YY}.pdf

☐   ___/___/_____   Upload SRN Staff Report {MM-DD-YY of Draft ROP}.doc & SRN Staff Report {MM-DD-YY of Draft ROP}.pdf

☐   ___/___/_____   Upload SRN {Name of Plan}.pdf

☐   ___/___/_____   Upload SRN Public Notice {MM-DD-YY of Draft ROP}.doc & SRN Public Notice {MM-DD-YY of Draft ROP}.pdf

<u>45 Day EPA Review</u>

☐   ___/___/_____   Convert SRN Proposed {MM-DD-YY}.doc to .pdf

☐   ___/___/_____   Password Protect SRN Proposed {MM-DD-YY}.doc for Tracked Changes

☐   ___/___/_____   Convert SRN Staff Report {MM-DD-YY of Proposed ROP}.doc to .pdf

☐   ___/___/_____   Convert SRN {Name of Plan}.doc to .pdf

☐   ___/___/_____   Upload SRN Proposed {MM-DD-YY}.doc & SRN Proposed {MM-DD-YY}.pdf

☐   ___/___/_____   Upload SRN Staff Report {MM-DD-YY of Proposed ROP}.doc & SRN Staff Report {MM-DD-YY of Proposed ROP}.pdf

☐   ___/___/_____   Leave SRN {Name of Plan}.pdf (or update if changed from 30-day)

☐   ___/___/_____   Remove SRN Draft {MM-DD-YY}.doc & SRN Draft {MM-DD-YY}.pdf

☐   ___/___/_____   Remove SRN Public Notice {MM-DD-YY of Draft ROP}.doc & SRN Public Notice {MM-DD-YY of Draft ROP}.pdf

☐   ___/___/_____   Remove SRN Staff Report {MM-DD-YY of Draft ROP}.doc & SRN Staff Report {MM-DD-YY of Draft ROP}.pdf

<u>Final ROP</u>

☐   ___/____/_____   Convert SRN Final {MM-DD-YY}.doc to .pdf

☐   ___/____/_____   Password Protect SRN Final {MM-DD-YY}.doc for Tracked Changes

☐   ___/____/_____   Convert SRN Staff Report {MM-DD-YY of Final ROP}.doc to .pdf

☐   ___/____/_____   Upload SRN Final {MM-DD-YY}.doc & SRN Final {MM-DD-YY}.pdf

☐   ___/____/_____   Upload SRN Staff Report {MM-DD-YY of Final ROP}.doc & SRN Staff Report {MM-DD-YY of Final ROP}.pdf

☐   ___/____/_____   Remove SRN Proposed {MM-DD-YY}.doc & SRN Proposed {MM-DD-YY}.pdf

☐   ___/____/_____   Remove SRN Staff Report {MM-DD-YY of Proposed ROP}.doc & SRN Staff Report {MM-DD-YY of Proposed ROP}.pdf

☐   ___/____/_____   Remove (previous final ROP) SRN Final {MM-DD-YY}.doc & SRN Final {MM-DD-YY}.pdf

☐   ___/____/_____   Remove SRN Staff Report {MM-DD-YY of previous Final ROP}.doc & SRN Staff Report {MM-DD-YY of Previous Final ROP}.pdf

☐   ___/____/_____   Remove ROP application {SRN Initial ROP App or SRN ROP Renewal App {date received}.pdf} and any modification applications posted

☐   ___/____/_____   Archive

FITT Check List for Reopenings (Rule 217(2))

COMPANY NAME:_____   **SRN:**_____

30 Day Public Period

☐ ___/____/_____   Convert SRN REO Draft {MM-DD-YY}.doc to .pdf

☐ ___/____/_____   Password Protect SRN Draft {MM-DD-YY}.doc for Tracked Changes

☐ ___/____/_____   Convert SRN Staff Report {MM-DD-YY of REO Draft ROP}.doc to .pdf

☐ ___/____/_____   Convert SRN {Name of Plan}.doc to .pdf

☐ ___/____/_____   Convert SRN REO Public Notice {MM-DD-YY of REO Draft ROP}.doc to .pdf

☐ ___/____/_____   Upload SRN REO Draft {MM-DD-YY}.doc & SRN REO Draft {MM-DD-YY}.pdf

☐ ___/____/_____   Upload SRN Staff Report {MM-DD-YY of REO Draft ROP}.doc & SRN Staff Report {MM-DD-YY of REO Draft ROP}.pdf

☐ ___/____/_____   Upload SRN {Name of Plan}.pdf

☐ ___/____/_____   Upload SRN REO Public Notice {MM-DD-YY of REO Draft ROP}.doc & SRN REO Public Notice {MM-DD-YY of REO Draft ROP}.pdf

45 Day EPA Review

☐ ___/____/_____   Convert SRN REO Proposed {MM-DD-YY}.doc to .pdf

☐ ___/____/_____   Password Protect SRN Proposed {MM-DD-YY}.doc for Tracked Changes

☐ ___/____/_____   Convert SRN Staff Report {MM-DD-YY of REO Proposed ROP}.doc to .pdf

☐ ___/____/_____   Convert SRN {Name of Plan}.doc to .pdf

☐ ___/____/_____   Upload SRN REO Proposed {MM-DD-YY}.doc & SRN REO Proposed {MM-DD-YY}.pdf

☐ ___/____/_____   Upload SRN Staff Report {MM-DD-YY of REO Proposed ROP}.doc & SRN Staff Report {MM-DD-YY of REO Proposed ROP}.pdf

☐ ___/____/_____   Leave SRN {Name of Plan}.pdf (or update if changed from 30-day)

☐ ___/____/_____   Remove SRN REO Draft {MM-DD-YY}.doc & SRN REO Draft {MM-DD-YY}.pdf

☐ ___/____/_____   Remove SRN Staff Report {MM-DD-YY of REO Draft ROP}.doc & SRN Staff Report {MM-DD-YY of REO Draft ROP}.pdf

☐ ___/____/_____   Remove SRN REO Public Notice {MM-DD-YY of REO Draft ROP}.doc & SRN REO Public Notice {MM-DD-YY of REO Draft ROP}.pdf
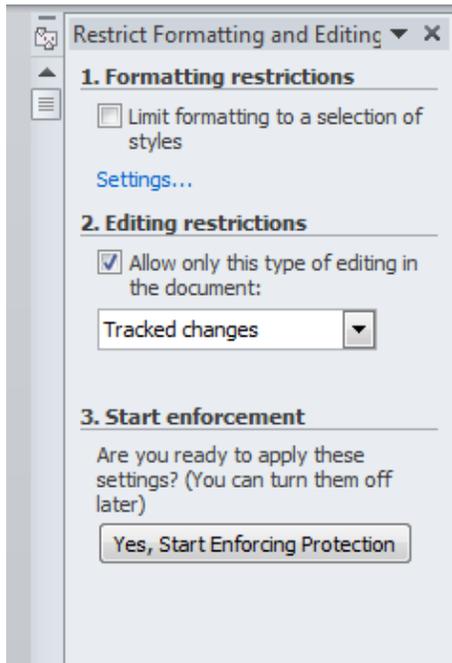
Final ROP

☐ ___/___/_____ Convert SRN Final {MM-DD-YY}.doc to .pdf

☐ ___/___/_____ Password Protect SRN Final {MM-DD-YY}.doc for Tracked Changes

☐ ___/___/_____ Convert SRN Staff Report {MM-DD-YY of Final ROP}.doc to .pdf

☐ ___/___/_____ Upload SRN Final {MM-DD-YY}.doc & SRN Final {MM-DD-YY}.pdf

☐ ___/___/_____ Upload SRN Staff Report {MM-DD-YY of Final ROP}.doc & SRN Staff Report {MM-DD-YY of Final ROP}.pdf

☐ ___/___/_____ Remove SRN REO Proposed {MM-DD-YY}.doc & SRN REO Proposed {MM-DD-YY}.pdf

☐ ___/___/_____ Remove SRN Staff Report {MM-DD-YY of REO Proposed ROP}.doc & SRN Staff Report {MM-DD-YY of REO Proposed ROP}.pdf

☐ ___/___/_____ Remove (previous final ROP) SRN Final {MM-DD-YY}.doc & SRN Final {MM-DD-YY}.pdf

☐ ___/___/_____ Remove SRN Staff Report {MM-DD-YY of Previous Final ROP}.doc & SRN Staff Report {MM-DD-YY of Previous Final ROP}.pdf

☐ ___/___/_____ Archive

Protecting a Document for Track Changes – WORD 2010 / 2016

To Prevent the Applicant from Disabling Track Changes

The ROP to be used by the applicant to submit their Renewal Application will be protected to prevent Track Changes from being disabled.   This function does not prevent the applicant from using different options under Track Changes.   The following steps must be taken to protect the Draft, Proposed and Final ROP WORD documents prior to posting to the FTP site:

1. Open the Draft, Proposed or Final ROP.
2. Click on the **Review** tab (on top Ribbon) then **Restrict Editing**.
3. **DO NOT** check the box under Formatting restrictions.
4. Select the "Allow only this type of editing" check box under the Editing Restrictions section.
5. Choose "Tracked Changes" from the drop-down list.
6. Select "Yes, Start Enforcing Protection."
7. Enter the AQD password when prompted, confirm the password, and click "OK".
8. Save the document.
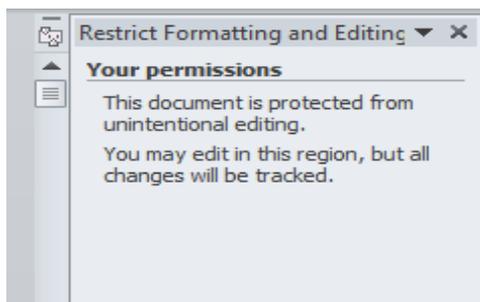
NOTE:
If you have done the above correctly, you will see this message on the side of the page. If this is **NOT EXACTLY** what you see, you have done it incorrectly.

To Unlock Track Changes when the ROP Renewal Application is Received

When the ROP mark-up is received with the renewal application, track changes must be unlocked to allow staff to work with the document.   The following steps must be taken to unlock the mark-up version of the ROP submitted with the renewal application:

1. Open the mark-up copy of the ROP.
2. Click on the **Review** tab (on top Ribbon) then **Restrict Editing**.
3. Click on the **Stop Protection** button at the bottom of the "Restrict Formatting and Editing" box.
4. Enter the AQD password and click "OK".
5. Remove the check from the "Allow only this type of editing in the document" check box in the Editing Restrictions section.
6. Close the Protect Document box by clicking on the "x" in the upper right-hand corner.
7. Save the document.