Procedure to Void an Issued ROP

Voiding an ROP (<u>no</u> Source-Wide PTI Required)

After an ROP is issued, a source may request to void the ROP if no longer subject to the ROP program. If the ROP includes a Source-Wide PTI, equipment at the source was subject to Rule 201. With ROP issuance, any PTIs for equipment subject to Rule 201 were re-issued as a Source-Wide PTI. If the Source-Wide PTI needs to remain active, go to the "Voiding an ROP Where the Source-Wide PTI Remains Active" procedure on page 3. It may be appropriate to void an ROP that includes a Source-Wide PTI under certain circumstances including the following:

- A source has been *issued* an opt-out permit that covers all equipment source-wide subject to Rule 201;
- A source is permanently shut down;
- A source has moved to a new location; or
- A source becomes a true minor with only Rule 201 exempt equipment.

If voiding an ROP that includes a Source-Wide PTI, and the Source-Wide PTI is also to be voided, use the procedure below. If the ROP does not include a Source-Wide PTI, use the procedure below.

Procedure

1. The site must submit through MiEnviro Portal using the Air Renewable Operating Permit (ROP) and/or Application Void Request Form to void or terminate an ROP as signed and certified by the Responsible Official or their Authorized Representative. The submission will include the site information, the submittal type, and the reason for voiding the ROP and Source-Wide PTI (if the ROP includes a Source-Wide PTI).

2. When the submission is received, the ROP Central Unit (RCU) Department Analyst (DA) will review the submission and add the appropriate workflow(s) (e.g., **ROP - Void Permit (no source-wide PTI)**, **ROP - Void Application**).

3. The DA will assign the submission to the appropriate Supervisor.

4. The Supervisor will receive a notification (via e-mail if this option is set) that the submission has been assigned to them. (This will also show in their **My Tasks** screen). The Supervisor will click on the link in the notification and will be navigated to the MiEnviro login page. After signing in, the system will take them to the submission **Details** tab.

5. The Supervisor will change the **Processor** to the appropriate staff person by navigating to the **Details** tab of the application and selecting the **Processor** using the dropdown menu.

6. District staff will review the request and determine if the ROP and Source-Wide PTI can be voided. Discuss with the supervisor if the void request is not approvable.

7. Review the tasks in the workflow(s) to see what tasks need to be completed. An "*" denotes a required step.

8. Prepare the void letter using **ROP - Letter - Permit Void**. The response letter is to be addressed to the Responsible Official(s) and signed by the District Supervisor. Both the void approval and denial options are in the one template.

a. If approvable, grant the void request. If the source has any outstanding ROP applications (renewal or modifications), these should be voided (a **Workflow** will have been added for voiding applications). Both the ROP and any Source-Wide PTI should be voided. Save the letter as SRN_Void Permit Letter_ROP####### v#.#_{MM-DD-YYYY}. The **Security Classification** will be *internal* and the **Status** will be *Draft.*

b. If the void request is not approvable, deny the void request with an explanation as to the reason for denial. Save the letter as SRN_Void Permit Denied Letter_ROP####### v#.#_{MM-DD-YYYY}. The **Security Classification** will be *internal* and the **Status** will be *Draft.*

9. Assign the *Finalize Letter* task to the Secretary.

10. The Secretary will finalize the letter changing the **Security Classification** to *Public* and the **Status** to *Final*, and send to the Responsible Official(s) making sure to copy EPA, the Field Operations Manager, RCU DA, and RCU Supervisor.

11. The Secretary will open the Existing ROP document under the appropriate permit record and Insert "VOID" at the top of the ROP and insert "Void Date: {Spell out date; e.g., January 1, 2025}" under the expiration date on the cover sheet. Save the voided ROP as SRN_Void ROP####### v#.#_{MM-DD-YYYY}. The **Security Classification** will be *Public* and the **Status** will be *Final*.

12. The Secretary will open the Existing Staff Report document under the appropriate permit record and Insert "VOID" at the top of the Staff Report. Save the voided Staff Report as SRN_Void Staff Report_ROP####### v#.#_{MM-DD-YYYY}. The **Security Classification** will be *Public* and the **Status** will be *Final*.

13. From the Permit, the DA will update the **Status** to *Terminated.*

a. If any red validation messages display, the DA will need to resolve before proceeding. Contact the Processor to resolve,

14. The DA will navigate to the Submission **Workflow and Tasks** tab to make sure all required tasks have been completed. For each workflow, click the checkbox for the *ROP - Void Permit (no source-wide PTI) and the ROP - Void Application (if there)* workflow and click the **Mark Complete** button.

15. The DA will navigate to the **Details** tab of the Submission and update the Status of the application forms separately by clicking each **Update Status**. Update **Status** to *Complete* or *Withdrawn* (for ROP initial, renewal, or modification applications).

16. If any validation errors are displayed in red, the DA will need to resolve those before continuing.

Voiding an ROP Where the Source-Wide PTI Remains Active

After an ROP is issued, a source may request to void the ROP if no longer subject to the ROP program. However, the Source-Wide PTI may need to remain active because the PTI terms and conditions remain in effect unless the criteria of Rule 201(6)(a) or (c) are met.

Procedure

1. The site must submit through MiEnviro Portal using the Air Renewable Operating Permit (ROP) and/or Application Void Request Form to void or terminate an ROP as signed and certified by the Responsible Official or their Authorized Representative. The submission will include the site information, the site information, and the reason for voiding the ROP and why the Source-Wide PTI is still required.

2. When the submission is received, the ROP Central Unit (RCU) Department Analyst (DA) will review the submission and add the appropriate workflow(s) (e.g., **ROP - Void Permit (source-wide PTI remains active)**, **Source-Wide PTI – New**, **ROP - Void Application**).

3. The DA will assign the submission to the appropriate Supervisor.

4. The Supervisor will receive a notification (via e-mail if this option is set) that the submission has been assigned to them (This will also show in their **My Tasks** screen). The Supervisor will click on the link in the notification and will be navigated to the MiEnviro login page. After signing in, the system will take them to the submission **Details** tab.

5. The Supervisor will change the **Processor** to the appropriate staff person by navigating to the **Details** tab of the application and selecting the **Processor** using the dropdown menu.

6. The assigned staff will review the request and determine if the ROP can be voided, and if a Source-Wide PTI needs to remain active. (_Note_: _If the source recently was issued an opt-out PTI that covers all equipment subject to Rule 201 at the source, the Source-Wide PTI can be voided with the ROP void. Use the procedure "Voiding an ROP (no Source-Wide PTI Required)."_) Discuss with management if the void request is not approvable and if denying request, jump to step 11.b. below.

7. The assigned staff will notify the DA if the Source-Wide PTI will remain and the DA will add the **Workflow** for the Source-Wide PTI to the Submission.

8. Review the tasks in the workflow(s) to see what tasks need to be completed. An "*" denotes a required step.

9. For approvable requests, assigned staff will prepare the Source-Wide PTI according to the procedure "_creating a stand-alone Source-Wide PTI_" below (Page 5).

10. Assigned staff will add the **Permits** reporting schedules for the _Source-Wide PTI_ as appropriate

11. After the Source-Wide PTI is completed (Page 5, Steps 1-6), prepare the void letter using **ROP - Letter - Permit Void (with Source-wide PTI)**. The response letter is to be addressed to the Responsible Official(s) and signed by the District Supervisor. Both the void approval and denial options are in the one template.

    a. If approvable, grant the void request. If the source has any outstanding ROP applications (renewal or modifications), these should be voided (a **Workflow** will have been added for voiding applications). Both the ROP and any Source-Wide PTI should be voided. Save the

letter as SRN_Void Permit Letter_ROP####### v#.#_{MM-DD-YYYY}. The **Security Classification** will be *internal* and the **Status** will be *Draft.*.

    b. If the void request is not approvable, deny the void request with an explanation as to the reason for denial. Save the letter as SRN_Void Permit Denied Letter_ROP####### v#.#_{MM-DD-YYYY}. The **Security Classification** will be *internal* and the **Status** will be *Draft.*

11. Assign the *Finalize Documents* task to the Secretary.

12. The Secretary will finalize the letter changing the **Security Classification** to *Public* and the **Status** to *Final*, and send to the Responsible Official(s) making sure to copy EPA, the Field Operations Manager, RCU DA, and RCU Supervisor.

13. The Secretary will open the Existing ROP document under the appropriate permit record and Insert "VOID" at the top of the ROP and insert "Void Date: {Spell out date; e.g., January 1, 2025}" under the expiration date on the cover sheet. Save the voided ROP as SRN_Void ROP####### v#.#_{MM-DD-YYYY}. The **Security Classification** will be *Public* and the **Status** will be *Final*.

14. The Secretary will open the Existing Staff Report document under the appropriate permit record and Insert "VOID" at the top of the Staff Report. Save the voided Staff Report as SRN_Void Staff Report####### v#.#_{MM-DD-YYYY}. The **Security Classification** will be *Public* and the **Status** will be *Final*.

15. From the Permit, the DA will update the **Status** to *Terminated.*

    a. If any red validation messages display, the DA will need to resolve before proceeding. Contact the Processor to resolve,

16. The DA will navigate to the Submission **Workflow and Tasks** tab to make sure all required tasks have been completed. For each workflow, click the checkbox for the *ROP - Void Permit (source-wide PTI remains active), Source-Wide PTI – New, and the ROP - Void Application (if there)* workflow and click the **Mark Complete** button.

17. The DA will navigate to the **Details** tab of the Submission and update the Status of the application forms separately by clicking each **Update Status**. Update Status to *Complete* or *Withdrawn* (for ROP initial, renewal, or modification applications).

18. If any validation errors are displayed in red, the DA will need to resolve those before continuing.

Creating a Stand-Alone Source-Wide PTI

When an ROP is voided and the Source-Wide PTI is still required, the conditions in the Source-Wide PTI (which are conditions from previously issued PTIs) must be separated from the ROP. This will require removal of all ROP references and ROP only conditions from the permit to create the stand-alone Source-Wide PTI. If the ROP has more than one section, discuss with management how to handle. *If during the processing, it is discovered that the stand-alone Source-Wide PTI will be un-enforceable because it is missing emission limits and standards, operational requirements and limits, sufficient testing, monitoring, recordkeeping, reporting, and compliance evaluation activities, discuss with management.*

Draft Source-Wide PTI:
1. Save a copy of the ROP in effect in the Documents for the Source-Wide PTI as SRN_Draft_SWPTI###### v#.#. The Source-Wide PTI number and effective date will remain the same as this is not a re-issuance of the Source-Wide PTI.
   a. On the certificate cover page, remove the "RENEWABLE OPERATING PERMIT" box. In the "SOURCE-WIDE PERMIT TO INSTALL" box, make sure that Section 5505(1) of Act 451 is cited in the first sentence.
   b. For all permit headers, remove the ROP No. and Expiration Date leaving the Source-Wide PTI No.
   c. Remove the AUTHORITY AND ENFORCEABILITY page.

2. A. GENERAL CONDITIONS:
   a. Any general conditions (GCs) specific to the ROP program must be removed leaving GCs 9, 11, 12, 13, 25 and 43 to 46. In addition, an ROP reference must be removed from the beginning of GC 11 and a Responsible Official reference removed from the end of GC 25. The remaining nine (9) conditions should be renumbered appropriately.

3. B. SOURCE-WIDE CONDITIONS:
   a. Remove any references to the ROP (e.g., 1st paragraph, 2nd sentence "and any other terms and conditions contained in this ROP").
   b. Remove any conditions that were added per Rule 213. These conditions should have no footnote 1 or 2.
   c. If the special conditions were moved from a PTI flexible group, such as FGFACILITY, these should all have the footnote 1 or 2. **Check the original PTI to make sure the special condition language is accurate, correct, and matches the intent of the original PTI.** (The original PTI conditions can stay in the B. SOURCE-WIDE CONDITIONS.)

4. C. EMISSION UNIT CONDITIONS:
   a. Remove any references to the ROP (e.g., 1st paragraph, 2nd sentence "and any other terms and conditions contained in this ROP").
   b. In the EMISSION UNIT SUMMARY TABLE, remove any emission units that are Rule 201 exempt.
   d. Remove any conditions that were added per Rule 213. These conditions should have no footnote 1 or 2.
   c. Review all emission unit conditions to make sure the special condition language came from a PTI. **Check the original PTI to make sure the special condition language is accurate, correct, and matches the intent of the original PTI.** Typos and mistakes can be corrected. Any streamlined/subsumed requirements will need to be removed (and any

footnotes to that effect), and the special condition returned to the language that was in the original PTI.

    d. If records were required to be maintained on file for a period of five years in the original PTI, keep "Records shall be maintained on file for a period of five years." in Sections V and VI. Change the applicable requirement back to R 336.1201(3). If records were not required to be kept for five years, then remove the sentence.

    e. If testing condition language was substantially modified or removed, the special condition from the original PTI needs to be returned.

    f. If the monitoring/recordkeeping condition language was substantially modified or removed, the special condition from the original PTI needs to be returned.

    g. All CAM conditions and applicable requirements will need to be removed. If CAM requirements were added to a condition with a footnote 2, return the special condition to the language that was in the original PTI.

5. D. FLEXIBLE GROUP CONDITIONS:

    a. Remove any references to the ROP (e.g., 1st paragraph, 2nd sentence "and any other terms and conditions contained in this ROP").

    b. In the FLEXIBLE GROUP SUMMARY TABLE, remove any flexible groups that did not come from a PTI.

    e. Remove any conditions that were added per Rule 213. These conditions should have <u>no</u> footnote 1 or 2.

    c. Review all emission unit conditions to make sure the special condition language came from a PTI. **Check the original PTI to make sure the special condition language is accurate, correct, and matches the intent of the original PTI.** Typos and mistakes can be corrected. Any ROP streamlined/subsumed requirements will need to be removed (and any footnotes to that effect), and the special condition returned to the language that was in the original PTI.

    d. If records were required to be maintained on file for a period of five years in the original PTI, keep "Records shall be maintained on file for a period of five years." in Sections V and VI. Change the applicable requirement back to R 336.1201(3). If records were not required to be kept for five years, then remove the sentence.

    e. If any testing condition language was substantially modified or removed, the special conditions from the original PTI needs to be returned.

    f. If any monitoring/recordkeeping condition language was substantially modified or removed, the special conditions from the original PTI needs to be returned.

    g. All CAM conditions and applicable requirements will need to be removed. If CAM requirements were added to a condition with a footnote 2, return the special condition to the language that was in the original PTI.

6. Appendices:

    a. Keep Appendix 1. Abbreviations and Acronyms

    b. Remove all appendices that did not come from a PTI.

    c. Remove any references to appendices in the Source-Wide PTI that no longer exist.

<u>Review of the Draft Source-Wide PTI:</u>

1. Assign the task, "District review" to the District Inspector (if not the assigned processor) and the "Supervisor review" to the District Supervisor for review and comment. Request review and comment or concurrence on the draft Source-Wide PTI within 7 days.

2. Email the draft Source-Wide PTI to the company and copy the District Supervisor and District Secretary. Request review and comment or concurrence on the draft Source-Wide PTI within 14 days.

3. Address any comments received as appropriate.

Technical review notes for the Source-Wide PTI:
The technical review notes need to contain the reason the ROP was voided, the PTIs that were issued to the company and are included in the Source-Wide PTI, and any corrections/changes that were made to the Source-Wide PTI to reflect the original conditions in the PTI including removal of Rule 213 conditions. Also, it should be noted any federal requirements (e.g., NSPS, area source MACT, etc.) that the source is subject to and whether the requirements are included in the Source-Wide PTI.
1. The technical review notes should be generated using the "ROP Template for Technical Review Notes" on the Submission for the ROP void application and named SRN_Technical Review Notes_SWPTI####### v#.#.
2. Document the name of permit writer, District Inspector, and company concurrence on the draft conditions, and dates of processing actions.
3. Document correspondence with the company.

Final Source-Wide PTI:
1. When Source-Wide PTI is final, create the void letter per step 11 on page 3.
2. Remove all draft from documents and Final.