

Minor Modifications (Rule 216(2))

Overview

A minor modification is defined in Rule 216(2) by what is not a minor modification. If a change does not require a significant modification (per Rule 216(3)) and does not qualify under Rule 215 or Rule 216(1) provisions, it may require a minor modification. For minor PTIs issued after the ROP is final that have not gone through a 30-day public comment period, the PTI must meet Rule 213 content requirements and the other criteria in Rule 216(2) to qualify as a minor modification.

Rule 216(2)(b) specifies that the ROP modification application must include:

- (1) description of change, emissions and new applicable requirements;
- (2) proposed changes to the ROP;
- (3) the certification by a responsible official;
- (4) AQD forms for submitting the application to EPA and affected states.

Construction may occur but trial operation cannot commence until the source applies for a minor modification to the ROP.

PROCEDURES	
	➤ MM Application Received
	1. Application Screening
	a. Application is date stamped and scanned.
	b. Verify that the applicant's request for change meets the criteria. If the application does not meet the criteria, send a letter to the company (ROP Rev Denial Letter.doc and save as SRN MM Denial.doc on T:\FLD\ROP\ROP-MOD\MODIFICATIONS). Return applications that do not qualify with the letter. The company may be contacted via phone call if deemed appropriate by the District Supervisor or Permit Writer.
	c. Verify that the application is complete. If the application is incomplete, send an additional information letter to the company (ROP Rev Additional Info Letter.doc and save as SRN MM Additional Info.doc).
	2. MACES
	The application is logged in MACES as a new application. Write the application number from MACES on the paper application.
	3. Save Application
	The application SRN MM {Application No.} {MM-DD-YY}.pdf is uploaded to the ftp site.
	4. Notifications
	Within 5 days of receipt of a complete application, send an e-mail (ROP Rev Application Received E-mail.doc and save as SRN MM App Received {MM-DD-YY}.doc) to the District Supervisor and EPA that application has been received.
	➤ MM Proposed ROP and EPA 45-Day Review
	Within 30 days of notifying the EPA and Affected States of receipt of the application:
	1. Prepare Staff Report Addendum
	a. Create a Staff Report addendum by opening the existing final Staff Report and clicking on the "Insert Amendment/Modification" button on the Toolbar and selecting Minor Modification, Proposed. It is important to include appropriate detail regarding the change(s).
	b. Add the "Amended Date" on the cover page. The amended date is the date that the Staff Report is revised, which is the date that the MM Proposed ROP is sent for EPA review. If there is a previous amended date, add a comma and add the new date.
	c. Update the Table of Contents and save the Staff Report as SRN Staff Report {MM-DD-YY of Proposed ROP}.doc .

	2. Prepare Proposed ROP
	a. Save SRN FINAL {MM-DD-YY}.doc (existing final ROP) from ftp site as SRN MM Proposed {MM-DD-YY}.doc .
	b. Add “[DATE] MM Proposed” to the center of the header of each page of the ROP, including the first page.
	c. Add the small letter in sequential order to the ROP number on the certification page to indicate that the ROP has been revised, e.g. MI-ROP-Z9999-2003a. Do likewise to the Source-wide PTI number, e.g. MI-PTI-Z9999-2003a.
	d. On the ROP certification page, insert “Revision Date: <i>{date of approval}</i> ” on a new line between the “Effective Date” and “Expiration Date.” Enter “Draft” as a place holder for the date because the modification is not final until after EPA review.
	e. Make the appropriate or requested changes to the ROP. Do not forget to update related tables such as the Emission Unit Summary and Flexible Group Summary tables, and any related appendices including Appendix 6 if a PTI is to be voided.
	f. Add the small letter in sequential order to the Source-Wide PTI number in the existing Appendix 6 paragraph, e.g., ...is being reissued as Source-Wide PTI number MI-PTI-Z9999-2003a.
	g. Update the Table of Contents and save the MM Proposed ROP.
	3. District Review
	Provide copy of the MM Working Draft ROP and Draft Staff Report to the appropriate District Supervisor and assigned district staff for review and comment. Incorporate changes as a result of that review.
	4. Company Review (Optional)
	a. Provide optional company review, if appropriate, by e-mailing the draft MM Proposed ROP and Staff Report to the company for comments (ROP Rev 7 Day Co Review E-mail.dot and save as SRN MM Company Review E-mail.doc).
	b. Make any changes to the MM Proposed ROP based on company comments.
	5. Company Letter with MM Proposed ROP
	Prepare a letter to the company (ROP Rev AA5, MM EPA Notice Letter.dot and save as SRN Letter with Proposed MM.doc) regarding EPA 45-day review period with a copy of the package that is being proposed.
	6. Prepare MM Proposed ROP Package
	a. Send e-mail to the District Secretary that the MM Proposed ROP, Staff Report and letter to the company are ready to be finalized. If the preliminary MM Proposed ROP was sent to the company and changes were made, the District Secretary/FITT Rep must make sure that all “track changes” in Word files have been accepted and saved properly before creating .pdf files.
	b. Upload the MM Proposed ROP and Staff Report to the ftp site.
	7. Mailings and Notifications
	a. Prepare an e-mail (ROP Rev EPA 45-Day Review E-mail.dot and save as SRN MM 45 Day E-mail.doc).
	b. The Permit Writer should then forward the e-mail to EPA and others as follows: <ul style="list-style-type: none"> ➤ blathras.constantine@epa.gov ➤ damico.genevieve@epa.gov ➤ blanchard.brian@epa.gov ➤ myottb@michigan.gov ➤ orentk@michigan.gov ➤ District Supervisor ➤ Company Contact
	c. Print e-mail for file.
	d. The District Secretary sends the letter signed by District Supervisor to company.

	8. MACES
	Update status in MACES with the start date of the 45-day EPA review under “Proposed Permit and Staff Report – EPA Review Start Date.”
	➤ Final ROP
	The EPA has 45 days to review the proposed changes to the ROP. If no comments are received from the EPA after the review period, the modified ROP can be issued. If comments are received, make any appropriate changes and include a description in the Staff Report addendum of the changes that were made.
	1. Prepare Final Staff Report
	a. If EPA provides comments during the 45-day review period, add a second addendum to explain those comments and changes made to the ROP. Open the existing SRN Staff Report {MM-DD-YY of Proposed ROP}.doc and click on the “Insert Amendment/Modification” button on the Toolbar and select Minor Modification, Final. It is important to include appropriate detail regarding any comments/changes. If no comments are received, do not add another addendum.
	b. Update the Table of Contents and save as SRN Staff Report {MM-DD-YY of Final ROP}.doc . Whether or not another addendum is added, the <u>final</u> ROP issuance date is required in the Staff Report file name. (If this is not done, the file name gives the appearance that the Staff Report was not completed.)
	2. Prepare Final ROP
	a. Delete “{DATE} MM PROPOSED” from the header of the ROP. Do not change the effective date and expiration date. Issuance of the MM does not change the effective date and expiration date of the original ROP.
	b. On the ROP certification page, insert the <i>date of approval</i> in the “Revision Date.”
	c. Update the Table of Contents and save as SRN Final {MM-DD-YY}.doc .
	3. Prepare Approval Letter to Responsible Official
	Prepare the approval letter (ROP Rev AA5, MM, SM, SOM Approval Letter.dot and save as SRN MM Approval {MM-DD-YY}.doc).
	4. Prepare Final ROP Package
	a. Send e-mail to the District Secretary that the modified ROP, Staff Report and approval letter are ready to be finalized. If changes were made to the ROP and/or Staff Report following EPA review, the District Secretary/FITT Rep must make sure that all “track changes” in Word files have been accepted and saved properly before creating .pdf files. The modified ROP must be put in Password Protect Track Changes.
	b. Upload the modified ROP and Staff Report to the ftp site
	c. E-mail Kelly Orent to update the “Recent Actions” webpage.
	5. Mailings and Notifications
	a. The District Secretary sends the approval letter to the Responsible Official(s) along with the Staff Report and the modified ROP signed by the District Supervisor. The District Secretary will notify the Permit Writer when the modified ROP is signed.
	b. The District e-mails a copy of the approval letter and the Internet address of the modified ROP to Sue Thelen of the Permit Section if a PTI has been incorporated via the MM process.
	6. MACES
	Update status in MACES with issuance date under “Permit – Effective Date.” The Permit Writer will add a, b, c extension to the ROP permit number in MACES.
	7. File
	Send the hard copy modification file to the District. The District Secretary will copy the final ROP and staff report for the District file.