GENERAL INSTRUCTIONS

Before completing any forms, please review the general instructions for definitions, applicability and other information necessary to understand, complete, assemble and submit the Renewable Operating Permit Application. Copies of the Michigan Air Pollution Control Rules or Operational Memoranda may be obtained by contacting a District Office as identified in Appendix A or the Air Quality Division (AQD) internet site at http://www.deq.state.mi.us/aqd.

RENEWABLE OPERATING PERMIT PROGRAM OVERVIEW

AUTHORITY

Renewable Operating (RO) Permits are required pursuant to Title V of the amendments to the federal Clean Air Act of 1990 (CAA) and Section 324.5506 [M.S.A. 13a.5506] of the Natural Resources and Environmental Protection Act, Public Act 451 of 1994, as amended (Act 451). The permit application forms are designed to collect information in accordance with these requirements.

The Rules cited in this document are derived from the Michigan Air Pollution Control Rules, R 336.1101 - R 336.2706 of the Michigan Administrative Code (MAC). It is important to note that the citations provided (e.g., Rule 210, Rule 212, etc.) are abbreviated versions of the rule numbers as they appear in the MAC. For example, Rule 210 and Rule 212 will appear in the MAC and Air Pollution Control Rules as R 336.1210 and R 336.1212. For more information about regulatory citations and how to obtain laws and rules on the Internet, refer to Appendix C of the *Michigan Manufacturers' Guide to Environmental and Safety and Health Regulations.* See Appendix B – Internet Sites for web site location.

ADMINISTRATIVE COMPLETENESS

The RO Permit application forms are designed to collect all information necessary for an administratively complete initial, modification or renewal application as required by Section 5506 of Act 451. The date of receipt of the application submittal pursuant to Rule 210 is determined by the day the application is received at the appropriate AQD or Wayne County office. The AQD will determine administrative completeness for an RO Permit application using manual and electronic screening. If the RO Permit application is submitted in paper form only, the AQD will make the administrative completeness determination within 60 days. If Permit Application Submittal System (PASS) software is used to electronically submit the RO Permit application along with the paper application, the AQD will make the administrative completeness determination within 15 days. See definitions for description of PASS.

CERTIFICATIONS

The responsible official, as defined in Rule 118(j), must certify that based on information and belief formed after reasonable inquiry, the statements and information in all submittals are true, accurate and complete. In accordance with the CAA, federal Credible Evidence Rule (62 FR 8314, February 24, 1997) and United States Environmental Protection Agency's (USEPA) White Paper Number 2 (Lydia Wegman to Regional Air Directors, March 5, 1996), the application must include information on all observed, documented, or known instances of noncompliance. Rule 210(2) specifies that a certification is required when submitting an initial or renewal application, supplemental information, as well as for applications to amend or modify an issued RO Permit. Knowingly certifying wrong information is grounds for enforcement action. A Certification form (C-001) is used to identify the responsible official(s) and certify submittals.

APPLICATION SHIELD

Rule 210(1) defines an application shield as, "the ability to operate the process and process equipment at a stationary source while a timely and administratively complete application is being reviewed and acted upon by the department." An application is considered timely pursuant to Rule 210(4)-(7) and it is considered administratively complete pursuant to Rule 210(2). Failure to provide a timely response to information requests may result in loss of the application shield. Loss of the application shield is grounds for enforcement action pursuant to Rule 210(1).

CONTACT INFORMATION

All inquiries, information requests and submittals for RO Permit applications should be directed to the appropriate District Offices of the AQD or Wayne County Air Quality Management Division as identified in Appendix A. For additional assistance, see the AQD and Environmental Assistance Division (EAD) Internet sites at http://www.deq.state.mi.us/aqd and http://www.deq.state.mi.us/ead/eosect/caap/ or call EAD at 1-800-662-9278.

APPLICABILITY

The RO Permit program applies to stationary sources as described in Rule 211. This document provides instructions for completing an RO Permit Application for initial submittals, modifications and renewals. This document does not address how to determine Rule 201 and Rule 210 applicability. Refer to *Michigan Guide to Air Use Permits to Install* and *Guide Book for Determining Applicability* for guidance on these determinations. Additionally, this document does not address how to determine Rule 215 or Rule 216 applicability for changes at a source after an RO Permit is issued. Refer to *Revised Operational Memorandum No. 2 - Changes at a Stationary Source after RO Permit Issuance* for information on the provisions of Rule 215 and Rule 216. These documents are available upon request. See Appendix B – Internet Sites for AQD and EAD web site locations or call EAD at 1-800-662-9278 for additional information.

- *Initial Application*
  After it is determined that a source is subject to the RO Permit program, an initial application must be submitted in accordance with Rule 210. Parts 1 and 2 of these instructions address initial application requirements.

- *Amendments, Modifications and Notifications of Change*
  After an RO Permit is issued, future changes at the source must eventually be incorporated into the RO Permit. The procedures for processing the changes to an existing RO Permit depend entirely on the nature of the change, as specified in Rules 215 and 216. The Change Notification & Amendment/Modification Application form (M-001) is used to provide notification of Rule 215 changes and to submit applications for Rule 216 amendments and modifications after the RO Permit is issued. The specific procedures for using this form and for completing notifications and/or applications are provided in Part 3 of these instructions.

- *Renewals*
  Rule 213(7) specifies that each RO Permit shall be issued for a fixed term of not more than 5 years. Rule 210(7) specifies that an administratively complete application for renewal of an RO Permit shall be considered timely if it is received by the AQD not more than 18 months, but not less than 6 months, before the expiration date of the current RO Permit. An application for renewal of an RO Permit must meet the same criteria as an application for an initial RO Permit as specified in Rule 210(2). Parts 1 and 2 of these instructions address renewal application requirements.

FORMS OVERVIEW

These forms must be used for all RO Permit application actions including initial applications, notifications of change, amendments, modifications and renewals. The forms are labeled "Renewable Operating Permit Application." The forms are located in Parts 2 and 3 of this packet and contain the forms (one of each type) and detailed instructions for each form. If additional forms are needed to report all the required data, make photocopies. The detailed instructions for each form are provided with the form to which they apply. Each numbered question is identified in bold type with instructions following. Examples are given in parenthesis. Some instructions are also provided on the forms themselves. The following is a brief description of each form and a summary of the original RO Permit application forms that it replaced.

- S-001 replaces the original S-001, S-002 (part)
- SI-001 replaces the remainder of the original S-002
- S-002 replaces the original S-003
- C-001 replaces the original S-004
- EU-001 replaces the original DV-001
- EU-002 replaces part of the original G-001
- EU-003 replaces the original G-001
- FG-001 replaces the original G-002
- AR-001 and AR-002 replaces the original AR-001, AR-002, and AR-003
- MS-001, MS-002, and MS-003 replace the original MS-001, MS-002, MS-003, MS-004, MS-005, MS-006, MS-007 and MS-008
- AI-001 replaces the original AI-001, CP-001, CP-002 and CI-001
- M-001 is an entirely new form
- A-101 from the Michigan Air Emission Reporting System (MAERS) is used in place of the original MI-001, MI-002, MI-003 and MF-001
- E-101 from the Michigan Air Emission Reporting System (MAERS) is used in place of the original MF-002
- SV-101 from the Michigan Air Emission Reporting System (MAERS) is used in place of the original SV-001

Refer to the detailed instructions for specific information, examples and a description of the applicability and use of each form.

Source (S-001): This form is used for basic source information and can be completed independent of the rest of the application. Information contained in this form includes company name, location of the source and owner information. Required attachments (e.g., building layouts, site plans, etc.) must be included in the application. See definition of Additional Information form.

Contact/Responsible Official (S-002): This form is used for information concerning the contact and responsible official for the application and permit. If there is more than one contact or responsible official for the source, or a contact or responsible official for each section, information must be completed for each contact or responsible official.

Certification (C-001): This form is used as a certification for all RO Permit application actions and notifications of change, amendments or modifications to an RO Permit.

Exempt Emission Unit (EU-001): This form is used to identify exempt equipment pursuant to Rule 212(4). Rule 212(4) requires the source to provide a description of the exempt emission unit, including control equipment. See EU-001 instructions for additional details regarding exempt emission units with existing permits.

Emission Units For Rules 281(h), 287(c) or 290 (EU-002): This form is used to identify emission units, describe all process equipment and list control devices for emission units that meet the requirements of the listed rules.

Emission Unit (EU-003): This form is used to identify emission units, describe all process equipment and list control devices and stacks with applicable requirements which belong to the emission unit.

Flexible Group (FG-001): This form is used to identify groups of emission units with common or identical applicable requirements.

Applicable Requirements (AR-001 and AR-002): These forms are used to identify applicable requirements (see Rule 101(o)) and requirements established in an RO Permit pursuant to Rule 213.

Monitoring Systems (MS-001, MS-002 and MS-003): These forms are used to identify monitoring and recordkeeping information, testing and sampling information, and reporting information that is used to show compliance with each applicable requirement that requires a compliance demonstration. Monitoring systems may be existing or proposed. Some method of compliance demonstration must be identified for every emission limit, material limit, and operational restriction. Therefore, if there is no existing monitoring system, the source must propose a compliance demonstration method.

Section Identification (SI-001): This form is used for Section information if the permit is sectioned. This form provides identification for each Section of a sectioned permit, and lists all of the emission units, flexible groups, contact(s) and responsible official(s) associated with the Section. See Sectioned RO Permits heading on page 8 for further details.

Additional Information (AI-001): This form is used to submit information or attachments to supplement the specific information requested in the application including confidential information, compliance plans, progress reports and process flow diagrams. A narrative description and any other information that the applicant feels is necessary to supplement the specific information requested may also be included. Additional information is not limited to text and may include calculations, design parameters, tables or small diagrams. Attachments such as drawings, graphs, manufacturer's literature, demonstrations or protocols may also be necessary to supplement or clarify the information on a form. Any attachments specifically required for an individual form are identified on the form, or in the instructions for that form. Attachments must be labeled with the Additional Information ID. If the information or attachment is more than one page in length, label each page to show the relationship between pages. Additional information or attachments must be provided using an AI-001. See the instructions for AI-001 for details.

Change Notification or Amendment/Modification Application (M-001): This form is used to identify any changes after RO Permit issuance. Pursuant to Rule 215, this form provides a notification of change. Pursuant to Rule 216, this form provides application for administrative amendments, minor modifications, or significant modifications. See Part 3 of the Instructions for further information.

CREATING OPERATOR IDs

By definition, an Operator's ID consists of a pre-established ID prefix and up to 14 additional alphanumeric characters. Operator IDs should be simple, self-descriptive and unique. The ID should help identify the information to which it pertains. For example, an Operator's Emission Unit ID for a boiler may be **EU**BOILER and an Operator's Flexible Group ID for a group of similar boilers may be **FG**BOILERS. Similarly, an Operator's Applicable Requirement ID may be **AR1**EL001. An example of an Operator's Monitoring System ID for a continuous emissions monitor system (CEMS) for carbon monoxide (CO) is **MS**CEMSCO and an example of an Operator's ID for Additional Information is **AI**BOILERINFO#1.

Additionally, if an RO Permit is sectioned, it should include a consistent suffix to each Operator's ID that specifies the section to which it pertains. For example, if an RO Permit has two sections and each section contains a paint booth, the Operator's Emission Unit IDs might be EUPAINTBOOTH1S1 and EUPAINTBOOTH1S2. In this case, "S1" would refer to section one in the RO Permit and "S2" would refer to section two in the RO Permit.

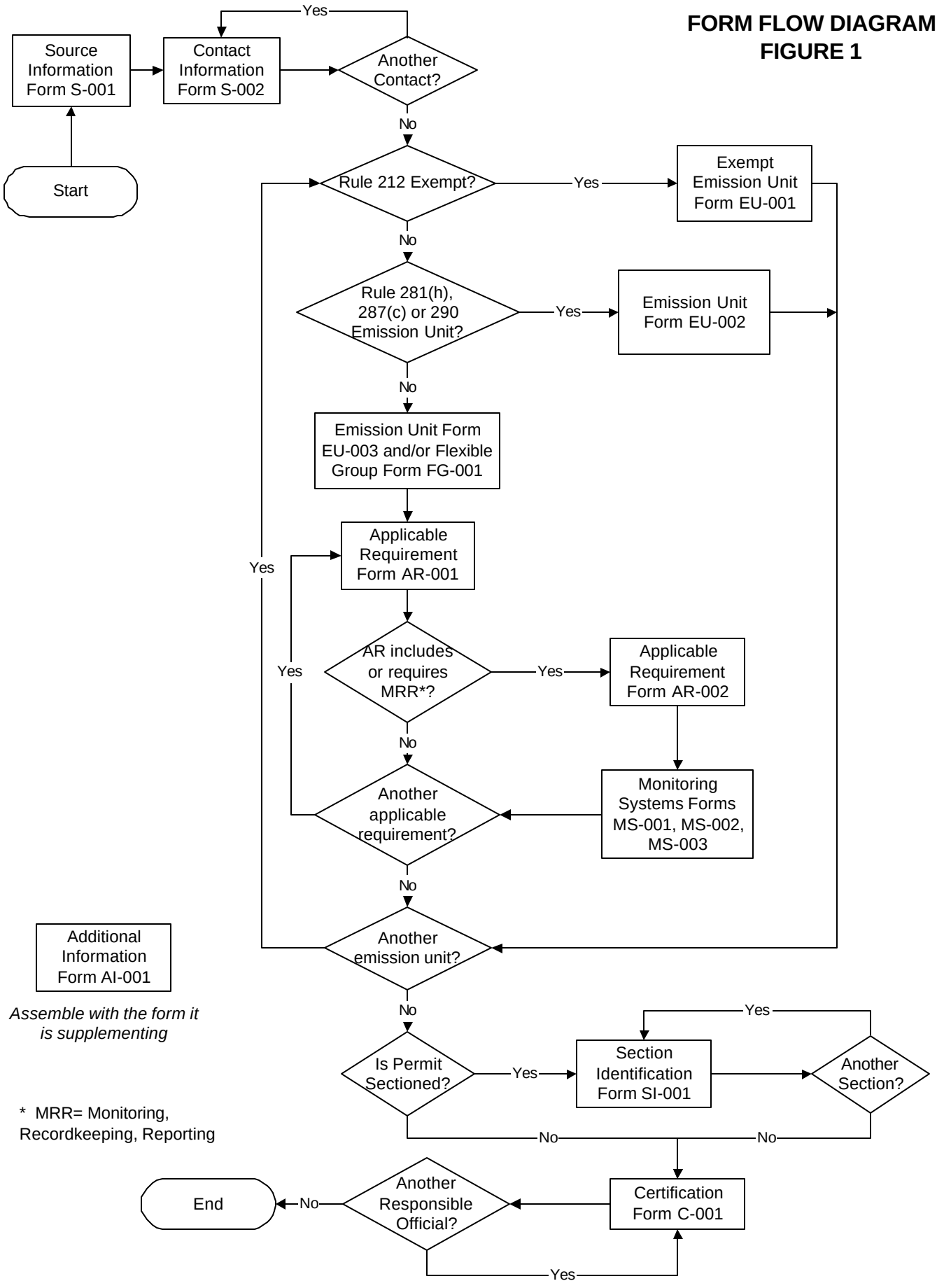
Operator's IDs can be established through a New Source Review (NSR) or RO Permit application or Michigan Air Emissions Reporting System (MAERS). Each emission unit, flexible group, and stack at a stationary source should only have one unique Operator's ID that is consistent between NSR Permits, RO Permits, and MAERS. Changes to an existing Operator's ID will only be made through an NSR or RO Permit application.

FORM RELATIONSHIP AND APPLICATION ASSEMBLY

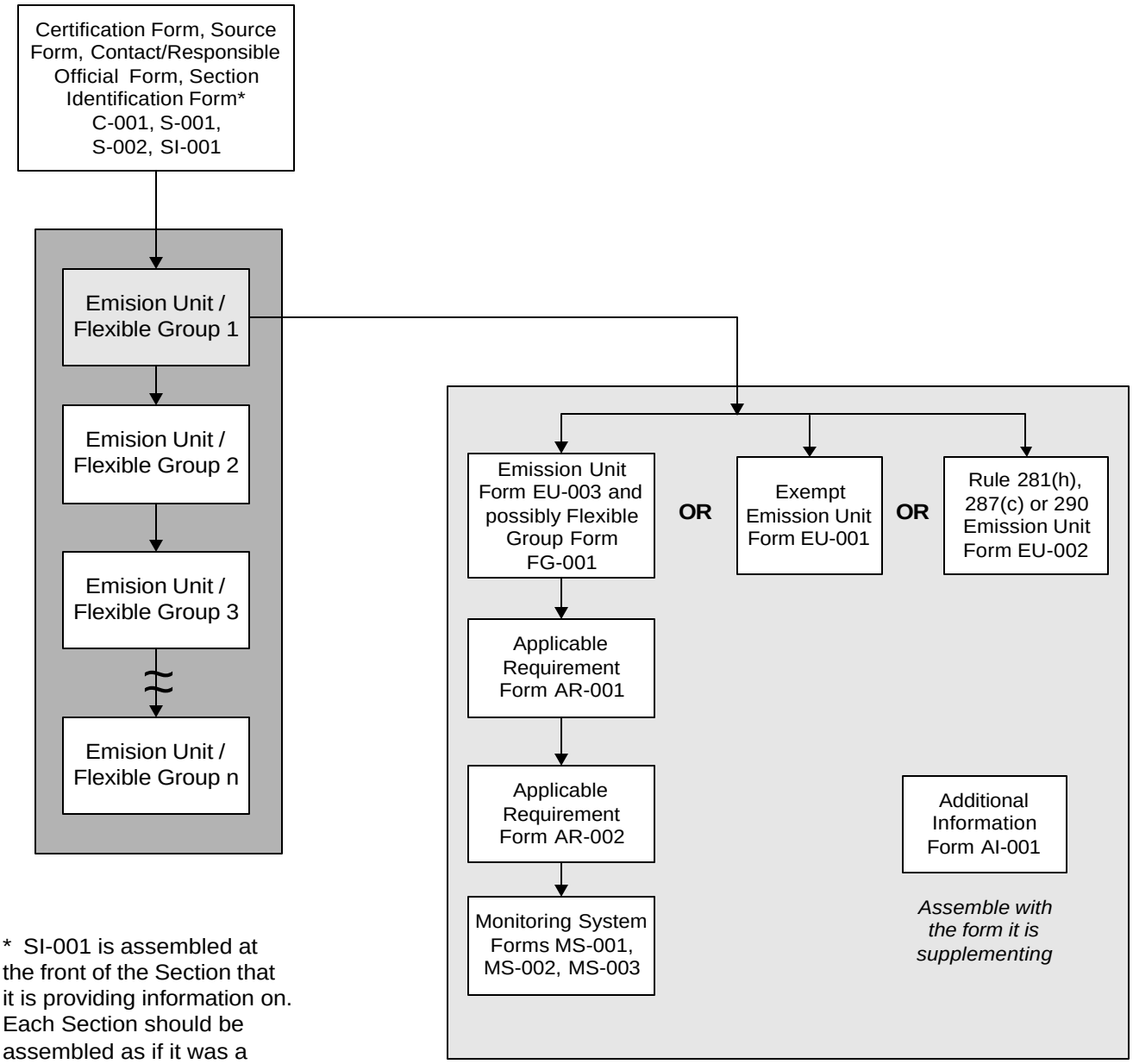
Form Relationships and Application Assembly for Amendments, Modifications and Notifications of Change are discussed in Part 3 of the instructions.

The Form Flow Diagram (Figure 1) was designed to show the connection between the different form types. It also represents a recommended form flow for completing the application. The RO Permit program is based on applicable requirements; therefore all of the forms may not be required for a complete application. The Application Assembly Diagram (Figure 2) and the detailed instructions for each form provide an explanation of how the forms are related.

FORM FLOW DIAGRAM
FIGURE 1



APPLICATION ASSEMBLY DIAGRAM
FIGURE 2



* SI-001 is assembled at the front of the Section that it is providing information on. Each Section should be assembled as if it was a separate permit application, following the flows on this figure.

SECTIONED RO PERMITS

An RO Permit application contains one section by default. It is not necessary to section the permit beyond this default. The sectioning option is provided to allow a source to further divide the RO Permit application by physical locations or different management organizations (i.e. responsible officials) within the stationary source.

An RO Permit may be sectioned 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 Requirements. As stated in the RO Permit detailed instructions, multiple sections may be created for a stationary source with multiple physical locations or multiple responsible officials. Sections should not be created for separating emission units, flexible groups, or buildings within a stationary source.

The following examples should clarify the sectioning concept.

- A chemical plant has 100 different buildings. Production is divided into three separate areas: pharmaceuticals, adhesives and pesticides. These three areas contain 400 different emission unit/process groups. For sectioning, the source could create three sections, one for each production area.
- An automotive assembly plant and a powerhouse have 700 emission unit/process groups. For sectioning, the source could create two sections, one for the assembly plant and one for the powerhouse.
- A gas processing plant and a gas sweetening plant located on adjacent properties with different owners. For sectioning, the source could create two sections, one for the gas processing plant and one for the gas sweetening plant.
- A landfill and a landfill gas processing plant located on adjacent properties with different owners. For sectioning, the source could create two sections, one for the landfill and one for the landfill gas processing plant.

APPLICATION SUBMITTAL

ELECTRONIC SUBMITTAL

The RO Permit Application may be generated and submitted electronically by using the PASS software. Contact the District Office as identified in Appendix A or the AQD Internet site at http://www.deq.state.mi.us/aqd for a list of acceptable electronic submittal methods. Although the RO Permit Application is submitted electronically, a paper copy of the application forms must also be submitted. The PASS software allows the company to print the application forms. The RO Permit application package must be assembled in accordance with the Application Assembly Diagram (Figure 2). All submittals should be made to the appropriate AQD District Office. Use Appendix C to locate the county name in which the source is physically located and determine the appropriate AQD District Office.

PAPER SUBMITTAL

All information must be printed out from the PASS software or hand-printed clearly in ink or typed. Photocopies of the original blank application forms may be made in order to prepare a complete paper submittal. The RO Permit application package must be assembled in accordance with the Application Assembly Diagram (Figure 2). All submittals should be made to the appropriate AQD District Office. Use Appendix C to locate the county name in which the source is physically located and determine the appropriate AQD District Office.

DEFINITIONS

Administrative Amendments: Defined in Rule 216(1). See *Revised Operational Memorandum No. 2 - Changes at a Stationary Source after RO Permit Issuance* or AQD guidance documents for details regarding administrative amendments of RO Permits.

Applicable Requirement: Defined in Rule 101(o).

Best Available Control Technology (BACT): An emission limitation based on the maximum degree of emission reductions that can be achieved through the application of available production methods, systems and techniques. Energy costs, environmental and economic impacts, and other factors are also taken into consideration.

Clean Air Act (CAA): Amendments to the federal Clean Air Act were signed into law on November 15, 1990. The main points of the amendments include attainment deadlines for non-attainment areas for National Ambient Air Quality Standard (NAAQS) pollutants, guidelines for reduction of motor vehicle emissions, and air toxics that utilize Maximum Achievable Control Technology (MACT) standards. Likewise, plans for reducing acid rain precursors, sulfur oxides (SO_x) and nitrogen oxides (NO_x), are outlined. The operating permit program is introduced in Title V, stating that every major pollution source must have an operating permit, renewed every five years, that specifies its compliance requirements. The remaining parts of the Act include enforcement, climatic protection through the phase-out of chlorofluorocarbons (CFCs) and other stratospheric ozone damaging chemicals, and the final part which provides for research programs and monitoring activities.

Code of Federal Regulations (CFR): Regulations published by the executive departments and agencies of the federal government. Title 40 of the CFR contains all of the federal rules and regulations relating to protection of the environment.

Confidential Information: Specific information identified as confidential in the application which will not be made available to the general public. Information which may be kept confidential is limited. An AI-001 must be completed for all confidential information. See *Operational Memorandum No. 10 – Procedures for Handling of Confidential Materials and Freedom of Information Requests for Confidential Materials* for details on what may be kept confidential. Additional instructions concerning confidential information can be found in the instructions for AI-001.

Emission Unit: A device or a group of devices that operate together with a dependency between devices. An emission unit contains one or more process devices and zero or more control devices and related stacks. See *Operational Memorandum No. 6 – Procedures for Determining Emission Units* for additional guidance on determining emission units.

Exempt Emission Unit: A device or a group of devices that operate together with a dependency between devices that are exempt from Rule 210 pursuant to Rule 212. See Rule 212 for a complete list of emission units that are exempt from Rule 210. Also refer to the detailed instructions for EU-001.

Form Type: An alphanumeric identifier created by the AQD to identify each form (e.g., S-001, EU-001, AR-001).

Grandfathered: The Michigan Air Pollution Control Rules became effective on August 15, 1967. Therefore, any emission unit constructed after August 15, 1967, would be subject to the regulatory requirements enacted on that date. Emission units installed, modified or reconstructed before August 15, 1967 are not required to apply for a permit to install pursuant to Rule 201. For example, an emission unit installed in January 1965 would be grandfathered from Rule 201 if it was not modified or reconstructed after August 15, 1967. In general, an emission unit is considered to be grandfathered if it was installed,

modified or reconstructed prior to the promulgation date of an applicable requirement, unless the applicable requirement applies to existing emission units.

Hazardous Air Pollutants (HAPs): Air pollutants that are not covered by ambient air quality standards but which, as defined in the CAA, may reasonably be expected to cause or contribute to irreversible illness or death. The HAPs are defined in Section 112(b) of the CAA and listed in 40 CFR Part 63, Subpart C. A complete list of HAPs can be viewed at the USEPA web site. See Appendix B – Internet Sites for web site location.

ID Prefix: A code created by the AQD for specific types of IDs. The prefix becomes part of the ID and must be included whenever the ID is used. The following is a list of the ID prefixes:

MS – Monitoring Systems	SV – Stack and Vent	EU - Emission Unit (including exempt EU)
FG – Flexible Group	AR – Applicable Requirement	AI - Additional Information

Maximum Achievable Control Technology (MACT): An emission limitation that is equivalent to or more stringent than an emission limitation achieved, in practice, by the best controlled similar affected source. The emission limitation shall reflect the maximum degree of reduction in emissions that the permitting authority determines is achievable by the constructed or reconstructed major source. See the USEPA Unified Air Toxics Website listed in Appendix B – Internet Sites. See *also Operational Memorandum No. 15 – Procedures for Processing Permit Applications Subject to Federal Clean Air Act Section 112(g)* for additional details regarding case-by-case MACT determinations. The MACT standards are published as National Emission Standard for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 63.

Major Source: Defined in 40 CFR Part 70 – State Operating Permit Programs (70.2 Definitions).

Minor Modification: Defined in Rule 216(2). See *Revised Operational Memorandum No. 2 - Changes at a Stationary Source after RO Permit Issuance* or AQD guidance documents for details regarding minor modifications of RO Permits.

Modification: Making a physical or operational change in an existing emission unit which will increase the amount of any air contaminant not already allowed to be emitted under the conditions of a current permit or order. Also, a modification cannot result in the emission of any toxic air contaminant into the outer air not previously emitted. An increase in the hours of operation or an increase in the production rate up to the maximum capacity of the process or process equipment shall not be considered to be a change in the method of operation. The exception to this is if the process equipment is subject to enforceable permit conditions or enforceable orders which limit the production rate or the hours of operation; or both, to a level below the proposed increase.

National Ambient Air Quality Standards (NAAQS): Air quality standards established by the USEPA that apply to outside air throughout the country. The NAAQS set standards for six pollutants known as the criteria air pollutants to protect human health and welfare. The criteria air pollutants include: ozone (O_3), carbon monoxide (CO), total suspended particulate matter (PM), sulfur dioxide (SO_2), Lead (Pb), and nitrogen dioxide (NO_2).

National Emission Standard for Hazardous Air Pollutants (NESHAP): Emission standards set by the USEPA for air contaminants not covered by the NAAQS that may cause an increase in death or serious irreversible or incapacitating illness. The NESHAP regulations are promulgated in 40 CFR Parts 61 and 63. The NESHAP regulations promulgated prior to the CAA were published in 40 CFR Part 61. The NESHAP regulations promulgated as a result of the CAA are published in 40 CFR Part 63.

New Source Review (NSR) Permit: A Permit to Install, required by Rule 201, which authorizes the construction, installation, relocation or alteration of any process, fuel-burning, refuse-burning or control equipment in accordance with approved plans and specifications.

New Source Performance Standards (NSPS): Uniform national USEPA air emissions standards that limit the amount of pollution allowed from specific new sources or from existing sources that have been modified or reconstructed. The purpose of NSPS is for new sources of emissions to emit less pollution than their predecessors. The NSPS regulations are promulgated in 40 CFR Part 60.

Notification of Change: Defined in Rule 215. See *Revised Operational Memorandum No. 2 - Changes at a Stationary Source after RO Permit Issuance* for details regarding Notice of Change for RO Permits.

Operator's ID: A unique ID created by the source to identify and reference information in the application. The Operator's ID consists of a pre-established ID Prefix (e.g., EU, FG, AR, MS and AI) and up to 14 additional alphanumeric characters. Please see the section *Creating Operator IDs*.

Parametric Monitoring: A system that tracks process operating data and/or control data and uses the data as indicators for emissions. Parameters that may be measured include: vapor pressure, pressure drop, air flow, liquid flow, temperature, viscosity, pH, breakthrough, horsepower, water to fuel ratio, pounds of pollutant per time period, pounds of VOC per gallon applied coating solids, or visible emissions. Predictive Emission Monitoring Systems (PEMS) and Recordkeeping are parametric monitoring systems.

Periodic Monitoring: Monitoring, recordkeeping, testing or reporting requirements that are sufficient for making a compliance determination for an emission limit and/or restrictions.

Permit Application Submittal System (PASS): The RO Permit application may be generated and submitted electronically by using the PASS software. This software also allows the source to perform a preliminary electronic completeness check prior to submittal. The AQD is required to provide an administrative completeness determination and notification within 15 days of receipt of the submittal, pursuant to Rule 210(2)(a)(i)(B), when the PASS software is used by the applicant. This software is available upon request. See Appendix A for contact information.

Potential to Emit (PTE): The maximum capacity of a stationary source to emit an air contaminant under its current physical and operational design. Any physical or operational limit on the capacity of the stationary source to emit an air contaminant (e.g., air pollution control equipment, restrictions on hours of operation, the type or amount of material combusted, stored or processed) shall be treated as part of its design only if such limit, or the effect it would have on emissions, is legally enforceable.

Prevention of Significant Deterioration (PSD): A program that was established in Title I of the CAA and is used in the development of permits for new or modified sources in an area that is already in attainment. The intent of PSD is to prevent an attainment area from becoming a nonattainment area.

Reasonably Achievable Control Technology (RACT): The lowest emissions limit that a particular source is capable of meeting by the application of control technology that is both reasonably available, as well as technologically and economically feasible. The RACT is usually applied to existing sources in nonattainment areas.

Reconstruction: The replacement of components of an existing emission unit so that the fixed capital cost of the new components is more than 50 percent of the fixed capital cost that would be required to construct a comparable new emission unit and so that it is technologically and economically feasible to meet the applicable requirement.

Regulated Air Contaminant: Any dust, fume, gas, mist, odor, smoke, vapor, or any combination thereof that is sanctioned under the Michigan Natural Resources and Environmental Protection Act or the Michigan Air Pollution Control Rules.

Responsible Official: Defined in Rule 118(j).

Significant Modification: Defined in Rule 216(3). See *Revised Operational Memorandum No. 2 - Changes at a Stationary Source after RO Permit Issuance* for details regarding significant modifications of RO Permits.

Source Classification Code (SCC): An eight-character code that provides a detailed description of the processes associated with an emission unit. Refer to the electronic SCC table on the Internet at http://www.deq.state.mi.us/aqd. This table is also available upon request by contacting the AQD District Office for your area. See Appendix A for contact information.

Source Wide Requirement: Any applicable requirement that applies to the entire stationary source. For example, a synthetic minor HAP emission limit and associated recordkeeping that applies to the entire stationary source.

State Registration Number (SRN): The alphanumeric identifier assigned to a stationary source by the AQD. The SRNs are unique to a source and are comprised of a letter followed by four digits (e.g., A1497). If a source does not have an SRN, leave the SRN blank on all application forms. An SRN will be assigned during the RO Permit application review. However, a source must have an SRN to use the PASS software.

Stationary Source: Defined in Rule 119(q). See *Operational Memorandum No. 11 – Stationary Source Determinations* for details regarding stationary source determinations.

Title I: Refers to Title I of the CAA of 1990, which protects ambient air quality. Title I includes regulations pertaining to PSD, NSPS, NESHAP and NSR.

Title V: Refers to Title V of the CAA Amendments of 1990, which established the requirements for the RO Permit program.

Toxic Air Contaminant (TAC): Defined in Rule 120(f).

Underlying Applicable Requirement: The regulatory foundation on which an applicable requirement is based. For example, if an NSR permit contains a condition that limits the sulfur content in fuel oil, the permit condition is an applicable requirement. The underlying basis for creating this condition is Rule 401; therefore, Rule 401 is the underlying applicable requirement.