RENEWABLE OPERATING PERMIT: STAFF REPORT

{Source Name}

Staff Report Date: Spell out the date, e.g. January 1, 2025

Text in BLUE = Instructions
Text in RED = Language suggestions (Turn selected RED text to black font)
Text in GREEN = Examples
DELETE all GREEN, BLUE text when finished

State Registration Number (SRN):

Located: Facility Address, City or Township, County Name County, Michigan Zip Code

Renewable Operating Permit Number:

Air Quality Division Permit Writer:	{Name and Title} {Email address and Phone Number}
Air Quality Division Decision Maker:	{Name and Title}

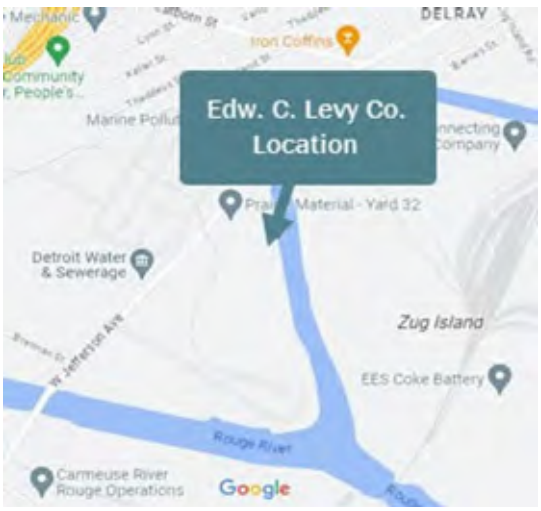

Figure 1: <<[SiteName]>> {Add Address Link to Map above}

Rule 214(1) of the administrative rules promulgated under Section 5506 of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a draft permit and a report (Statement of Basis) that sets forth the applicable requirements and factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

As part of EGLE's Limited English Proficiency Plan, an evaluation of the number of people who speak English "less than very well" was conducted within a 1-mile radius of the location using an environmental justice

screening tool like the USEPA's EJSCREEN. If additional languages were determined to be required, translation of the public notice will be done into any languages identified during the evaluation. If translation into other languages is needed or if there are other accessibility concerns, requests may be sent to EGLE-Accessibility@Michigan.gov.

Contents

Introduction

The Title V operating permit program is a national permitting system required by Title V of the Federal Clean Air Act of 1990, codified in Title 40 of the Code of Federal Regulations (CFR) Part 70, and is administered by each state. In Michigan, these permits are known as a Renewable Operating Permit (ROP). A Renewable Operating Permit or ROP is a specific type of air permit a source must have when emissions of air pollutants are above certain levels.

The ROP is intended to clarify a stationary source's applicable requirements and outlines compliance with them by consolidating all state and federal air quality requirements into one document. An ROP contains more monitoring, testing, recordkeeping, and reporting requirements than a permit for a facility with low levels of emissions.

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a Renewable Operating Permit (ROP) pursuant to Title V of the federal Clean Air Act and Michigan's Administrative Rules for Air Pollution Control promulgated under Section 5506 of Act 451. Sources subject to the ROP Program are defined in Rule 211.

An ROP consists of five parts. Part A contains the general conditions. Part B contains special conditions, if any, that apply source wide. Parts C and D contain special conditions for all processes at the stationary source that are subject to process-specific emission limits or standards. Part E lists non-applicable requirements. The ROP also contains eight or more appendices which detail various supplementary information or requirements. The purpose of this staff report is to provide information about the facility, what the facility does, the air quality rules and regulations that apply, compliance status, and the final action taken by EGLE, AQD.

Section 1: General Source Information

Source Description

Enter plain language description of source written out specifically in paragraph form. Key aspects on what to include in the Source Description are listed below:
Source location
What's located around the source? Nearest roads, residential areas, public places, etc.
What do they do?
How do they do it?
What is the main emitting equipment where the majority of the emissions are coming from? Include emissions information such as what pollutants are emitted.
What kind of control devices do they have?
What kind of monitoring systems (CEMS, etc.) do they have?

Changes Made to the Source Since the Last Renewal

Enter plain language description of changes made to the basic process and equipment. Include relevant changes to activities and emission units such as installation of new equipment, shutdown of existing equipment, and/or modification of emission units resulting in higher or lower emissions of air pollutants. [DELETE if initial.]

OR

No changes to the basic processes and equipment have been made since the last renewal.

Section 2: Facts and Basis

The following table provides information about the application, site contacts, and important dates related to the ROP.

ROP Details

North American Industry Classification System (NAICS) code:	
NAICS Name:	
Is Application for an Initial or Renewal Issuance?	
Application Number:	
Responsible Official:	[Name, Title] (Do NOT add phone number)
Date Application Received:	
Date Application Was Administratively Complete:	
Is Application Shield* in Effect?	
Date Public Comment Begins:	
Date Public Comment Ends:	

* An application shield allows a Title V subject source the ability to continue operating until final action is taken on the permit application provided the applicant submitted a timely and administratively complete application and provides timely responses to information requests during the application review.

The following table lists the potential emissions, and actual annual emissions of regulated air pollutants as reported to AQD for the year [Year]. {Site Name} must submit records of actual emissions for the pollutants listed in the table every year. [DELETE pollutants not reported.]

Total Annual Emissions

Pollutant	Potential Emissions in Tons per Year	Actual Emissions in Tons per Year
Carbon Monoxide (CO)		
Lead (Pb)		
Nitrogen Oxides (NOx)		
Particulate matter (PM) less than or equal to 10 microns in diameter (PM10)		
Particulate matter (PM) less than or equal to 2.5 microns in diameter (PM2.5)		
Sulfur Dioxide (SO_2)		
Volatile Organic Compounds (VOCs) / Non-Methane Organic Compounds (NMOCs)		

The following table lists hazardous air pollutant (HAP) emissions as listed pursuant to Section 112(b) of the federal Clean Air Act and reported OR calculated {Select One} by {Site Name} for the year [Year].

Total HAP emissions

Individual Hazardous Air Pollutants (HAPs)	Potential Emissions in Tons Per Year	Actual Emissions in Tons Per Year

OR

IF THE SOURCE IS AN AREA (AS IN TRUE MINOR) SOURCE OF HAPS, USE THE FOLLOWING SENTENCE.
The stationary source is an area source of hazardous air pollutant (HAP) emissions as listed pursuant to Section 112(b) of the federal Clean Air Act. No HAP emissions data is listed.

Source-Wide Permit to Install (PTI)

A Permit to Install (PTI) provides permission to a source to install a process and emit air contaminants up to certain specified levels. These levels are set by state and federal laws and regulations to protect health and welfare. By staying within the levels set by a PTI, a stationary source is operating lawfully, and public health and air quality are protected. Michigan's PTI Program includes major and minor New Source Review (NSR) and synthetic minor permitting.

The purpose of the ROP is to consolidate all existing air quality requirements including PTI(s) for a facility into one permit. The ROP conditions will focus on monitoring, testing, recordkeeping and reporting to ensure compliance with limits or restrictions established in PTI(s) or by other applicable air quality requirements.

Michigan Rule 214a requires the issuance of a Source-Wide PTI contained within the same document as the ROP to include all conditions established pursuant to Rule 201 Permits to install. All terms and conditions that are established in a PTI are identified with a footnote designation in the ROP.

PICK ONE

The following table lists the individual PTIs that are applicable requirements in this ROP. Appendix 6 of this ROP lists any PTIs issued, or ROP revision applications received since the effective date of the previously issued ROP.

PTIs included in the Source-Wide PTI. {list in each row the individual PTI including PTIs in Appendix 6}

PTI Number	Date Issued	Process Description (Emission Unit IDs)	Basis for Applicable Requirements
	Spell out the date, e.g. January 1, 2024		Major and Minor New Source Review (NSR), Synthetic Minor Opt-out for HAPs

PTI Number	Date Issued	Process Description (Emission Unit IDs)	Basis for Applicable Requirements

OR

The ROP does not contain a Source-Wide PTI pursuant to Rule 214a.

Air Quality Rules and Regulations

This section gives basic information about air quality rules and regulations that apply to the source and are included in the ROP.

Source Type by Pollutant

Pollutant	Title V Major Source	Major NSR Source	Major Nonattainment NSR Source	Synthetic Minor NSR Source	Major HAP Source	Synthetic Minor HAP Source	Area HAP Source
CO							
Lead							
NOx							
PM							
PM10							
PM2.5							
SO_2							
VOCs / NMOCs							
Individual HAP							
Aggregate HAPs							

{Put a "YES" in each cell that applies.} **OR** {Put a "YES(*)" in each cell that applies.}
(*) The source type by pollutant includes {Site Name (SRN), Site Name (SRN), and Site Name (SRN)} as one stationary source.

The stationary source is subject to 40 CFR Part 70 (the ROP Program) because

PICK ONE OR MORE OF THE FOLLOWING FOUR OPTIONS. COMBINE OR STREAMLINE SENTENCES WHERE APPROPRIATE TO AVOID REDUNDANT WORDING.

the potential to emit of all criteria pollutants / carbon monoxide / lead / nitrogen oxides / particulate matter / sulfur dioxide / volatile organic compounds exceeds 100 tons per year.

AND/OR

the potential to emit of any single HAP is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year. HAPs are regulated by Section 112 of the federal Clean Air Act.

AND/OR

the source is subject to 40 CFR Part 60 / 62 / 63 {SELECT ALL THAT APPLY}, Subpart {subpart} that requires the source to obtain a 40 CFR Part 70 permit.

IF THE SOURCE IS MINOR (AREA) OR OPT-OUT FOR HAPS, CHOOSE ONE OF THE FOLLOWING OPTIONS:

The stationary source is an area source of HAP emissions because the potential to emit of any single HAP is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year. HAPs are regulated by Section 112 of the federal Clean Air Act.

OR

The stationary source has accepted legally enforceable permit conditions limiting the potential to emit of any single HAP to less than 10 tons per year and the potential to emit of all HAPs combined to less than 25 tons per year. The source is considered a "synthetic minor" source. HAPs are regulated by Section 112 of the federal Clean Air Act. {Explain the "synthetic minor" restrictions.} **EXAMPLE:** The source is limited to 8.9 tons per year of any single HAP and 22.5 tons per year of all HAPs combined with restrictions on materials used and associated monitoring and recordkeeping.

INCLUDE THE FOLLOWING PARAGRAPH IF APPLICABLE FOR THIS RENEWAL

The owner/operator of the stationary source has requested removal of the provisions of the National Emission Standards for Hazardous Air Pollutants for {MACT Standard} promulgated in 40 CFR Part 63, Subpart {subpart} with this ROP renewal. The stationary source accepted legally enforceable permit conditions limiting the potential to emit of HAPs to below major source thresholds.

PICK ONE OF THE FOUR FOLLOWING PARAGRAPHS REGARDING NEW SOURCE REVIEW (NSR)

The stationary source is considered a "synthetic minor" source in regards to the Prevention of Significant Deterioration (PSD) regulations of the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of each criteria pollutant / carbon monoxide / lead / nitrogen oxides / particulate matter / sulfur dioxide / volatile organic compounds to less than 250 OR 100 {Select one} tons per year. (NOTE: USE 100 IF THE SOURCE IS ONE OF THE 28 CATEGORIES LISTED IN RULE 1801(cc)(i)) {Explain the "synthetic minor" restrictions.} **EXAMPLE:** The source is limited to 225.0 tons per year of CO emissions with restrictions on fuel usage and air pollution control equipment for CO with associated monitoring and recordkeeping.

OR

{LIST EU ID(s)} at the stationary source OR site {Select one} was / were subject to review under the Prevention of Significant Deterioration (PSD) regulations of PICK ONE OF THE FOLLOWING BASED ON UNDERLYING APPLICABLE REQUIREMENT AT TIME OF NSR PERMIT ISSUANCE: the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality OR 40 CFR 52.21, because at the time of New Source Review (NSR) permitting the potential to emit of each criteria pollutant / carbon monoxide / lead / nitrogen oxides / particulate matter / sulfur dioxide / volatile organic compounds {or more} was greater than {250 OR 100} tons per year. (NOTE: USE 100 IF THE SOURCES IS ONE OF THE 28 CATEGORIES LISTED IN RULE 1801(cc)(i)) OR regulated air pollutants were greater than significant. The PSD review requires a Best

Available Control Technology (BACT) analysis, an air quality impact analysis, and an additional impact analysis for each regulated air pollutant for which the project would result in significant emissions.

OR

No emission units at the stationary source OR site {Select one} were subject to the Prevention of Significant Deterioration (PSD) regulations of PICK ONE OF THE FOLLOWING BASED ON UNDERLYING APPLICABLE REQUIREMENT AT TIME OF NSR PERMIT ISSUANCE: the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality OR 40 CFR 52.21, because at the time of New Source Review (NSR) permitting the potential to emit of regulated pollutants was less than 250 OR 100 {Select one} tons per year. (NOTE: USE 100 IF THE SOURCE IS ONE OF THE 28 CATEGORIES LISTED IN RULE 1801(cc)(i))

OR

No emission units at the stationary source OR site {Select one} were subject to the Prevention of Significant Deterioration (PSD) regulations of the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality or 40 CFR 52.21 because the process equipment was constructed/installed prior to June 19, 1978, the promulgation date of the PSD regulations.

INCLUDE ANY OF THE FOLLOWING FOUR PARAGRAPHS IF APPLICABLE

The stationary source OR site {Select one} has {LIST EU IDs} that was / were subject to PICK ONE BASED ON THE UNDERLYING APPLICABLE REQUIREMENT AT THE TIME OF NSR PERMIT ISSUANCE: the Michigan Air Pollution Control Rules Part 19, New Source Review for Major Sources Impacting Nonattainment Areas OR Rule 220 (rescinded) for Major Sources Impacting Nonattainment Areas at the time of New Source Review (NSR) permitting. Major Nonattainment NSR review requires an analysis of alternative sites, sizes, production processes, and environmental control techniques plus must comply with the Lowest Achievable Emissions Rate (LAER) and provide emission reduction offsets.

{LIST EU ID(s)} was / were installed prior to August 15, 1967. As a result, this equipment is considered "grandfathered" and is not subject to New Source Review (NSR) permitting requirements.

Although {LIST EU ID(s)} was / were installed after August 15, 1967, this equipment was exempt from New Source Review (NSR) permitting requirements at the time it was installed. {Explain why exempt.} **EXAMPLE:** The fuel-oil burning equipment identified as EUPEAKER1 used for electric power generation was exempt from permitting pursuant to Rule 33(f) and Rule 36(c).

Emission units at the stationary source OR site {Select one} were subject to various state rules as well as federal regulations. These include minor New Source Review (NSR) permitting and state only air toxics rules. Emission units {LIST EU IDs} were subject to Rule 702 for Best Available Control Technology (BACT) of new sources of volatile organic compounds (VOCs).

Federal Requirements Included in the ROP

ALWAYS INCLUDE THIS PARAGRAPH

This section includes federal air regulations that were developed to implement and enforce standards of performance for new stationary sources and for National Emission Standards for Hazardous Air Pollutants (HAPs) that the source is subject to.

{Explain any federal requirements that apply to the source: NSPS, MACT, FIP requirements, State Plan, Federal Plan.}

ADD THE FOLLOWING FOR NSPS-SUBJECT SOURCES

{LIST EU ID(s)} is / are subject to the Standards of Performance for {Title of NSPS} promulgated in 40 CFR Part 60, Subparts A and {subpart for NSPS}. {Explain requirements from the subpart that apply to the source.}

EXAMPLES:

The natural gas-fired auxiliary boiler named EUAUXBOILER is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units promulgated in 40 CFR Part 60, Subparts A and Dc. This subpart requires fuel usage monitoring.

The diesel fuel-fired emergency generators named EUFPENGINE, EUEMGD, and EUFPRICE are subject to the Standards of Performance for Compression Ignition Internal Combustion Engines (CI ICE) promulgated in 40 CFR Part 60, Subparts A and IIII. This subpart contains non-methane hydrocarbon (NMHC) + NO_X, CO, and PM emission limits and associated compliance requirements.

The natural gas-fired turbines named EUCTGSC1, EUCTGHRSG2, and EUCTGHRSG3 are subject to the Standards of Performance for Stationary Spark Combustion Turbines promulgated in 40 CFR Part 60, Subparts A and KKKK. This subpart contains a NO_X emission limit, a sulfur fuel content restriction, and associated compliance requirements. If the turbine is associated with a heat recovery steam generator (HRSG) or duct burner, then the entire process must comply with the NO_X emission limit.

ADD THE FOLLOWING FOR PART 61 NESHAP-SUBJECT SOURCES

{LIST EU ID(s)} is / are subject to the National Emission Standards for Hazardous Air Pollutants for {title of NESHAP} promulgated in 40 CFR Part 61, Subparts A and {subpart of NESHAP}. {Explain requirements from the subpart that apply to the source}

ADD THE FOLLOWING FOR MACT (Part 63 NESHAP)-SUBJECT SOURCES

{LIST EU ID(s)} is / are subject to the National Emission Standards for Hazardous Air Pollutants for {title of MACT standard} promulgated in 40 CFR Part 63, Subparts A and {subpart of MACT standard}. {Explain requirements from the subpart that apply to the source}

EXAMPLES:

The natural gas-fired turbines named EUCTGSC1, EUCTGHRSG2, and EUCTGHRSG3 are subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines promulgated in 40 CFR Part 63, Subparts A and YYYY. This subpart contains a formaldehyde emission limit and associated compliance requirements.

The diesel fuel-fired emergency generators named EUFPENGINE, EUEMGD, and EUFPRICE are subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines promulgated in 40 CFR Part 63, Subparts A and ZZZZ. Compliance with 40 CFR Part 63, Subpart ZZZZ is demonstrated through compliance with 40 CFR Part 60, Subpart IIII.

USE FOR MUNICIPAL SOLID WASTE LANDFILLS-SUBJECT SOURCES

{LIST EU ID(s)} is / are subject to the Standards of Performance for Municipal Solid Waste Landfills that commenced construction, reconstruction, or modification after July 17, 2014, promulgated in 40 CFR Part 60, Subparts A and XXX.

The stationary source OR site {Select one} is subject to the National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills as promulgated in 40 CFR Part 63, Subparts A and AAAA. The permittee has opted to comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the provisions in 40 CFR 63.1960 and 40 CFR 63.1961) for a municipal solid waste landfill with a gas collection and control system. The regulatory language in 40 CFR Part 60, Subpart XXX and 40 CFR Part 63, Subpart AAAA are similar but not identical. Where applicable, similar citations are grouped together.

OR

The stationary source OR site {Select one} was subject to the Standards of Performance for Municipal Solid Waste Landfills promulgated in 40 CFR Part 60, Subparts A and WWW. On June 21, 2021, the facility became subject to the Federal Plan Requirements for Municipal Solid Waste Landfills that commenced construction on or before July 17, 2014, and have not been modified or reconstructed since July 17, 2014, as specified in 40 CFR Part 62, Subpart OOO. The stationary source is considered a legacy landfill under the Federal Plan. Michigan is not currently the authorized representative and is implementing and enforcing this regulation through the ROP.

The stationary source OR site {Select one} is subject to the National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills as promulgated in 40 CFR Part 63, Subparts A and AAAA. The permittee has opted to comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the provisions in 40 CFR 63.1960 and 40 CFR 63.1961) for a municipal solid waste landfill with a gas collection and control system. The regulatory language in 40 CFR Part 62, Subpart OOO and 40 CFR Part 63, Subpart AAAA are similar but not identical. Where applicable, similar citations are grouped together.

USE FOR AN AREA SOURCE MACT FOR WHICH EGLE-AQD IS NOT DELEGATED.

{LIST EU ID(s)} is / are subject to the National Emission Standards for Hazardous Air Pollutants for {name of the MACT} promulgated in 40 CFR Part 63, Subparts A and {subpart of MACT}. The AQD is not currently delegated the regulatory authority for this area source standard but the source is still required to comply.

OR

No emission units at the stationary source OR site {Select one} are subject to these federal air regulations.

Acid Rain

ALWAYS INCLUDE THIS PARAGRAPH

The Acid Rain Program (ARP) was the first national cap and trade program in the country and it introduced a system of allowance trading that requires major emission reductions of SO_2 and NO_X, the primary precursors of acid rain, from the power sector. EGLE, AQD is the authority responsible for issuance of Phase II Acid Rain (Title IV) Permits in Michigan. The Acid Rain Permit and requirements are incorporated into the source's ROP.

ADD THE FOLLOWING FOR ACID RAIN-SUBJECT SOURCES

{LIST EU ID(s)} is / are subject to the federal Acid Rain Program promulgated in 40 CFR Part 72.

OR

No emission units at the stationary source OR site {Select one} are subject to the federal Acid Rain Program.

Cross-State Air Pollution Rule

ALWAYS INCLUDE THIS PARAGRAPH

This is a federal cap and trade program that addresses air pollution from power plants in upwind states that cross state lines and affects air quality in downwind states. This is done by regulating annual emissions of NO_X and SO_2 as well as NO_X emissions during the ozone season (May 1 through September 30).

SELECT ALL OF THE FOLLOWING THAT APPLY TO CSAPR-SUBJECT SOURCES

{LIST EU ID(s)} is / are subject to the Cross-State Air Pollution Rule NO_X Annual Trading Program pursuant to 40 CFR Part 97, Subpart AAAAA.

{LIST EU ID(s)} is / are subject to the Cross-State Air Pollution Rule NO_X Ozone Season Group 3 Trading Program pursuant to 40 CFR Part 97, Subpart GGGGG.

{LIST EU ID(s)} is / are subject to the Cross-State Air Pollution Rule SO_2 Group 1 Trading Program pursuant to 40 CFR Part 97, Subpart CCCCC.

OR

No emission units at the stationary source OR site {Select one} are subject to the Cross-State Air Pollution Rule.

NOx SIP Call

ALWAYS INCLUDE THIS PARAGRAPH

The NOx SIP Call is a regulatory program initiated by the USEPA in 1998 to address the interstate transport of nitrogen oxides (NOx), which are precursors to ozone pollution. The program requires states to develop State Implementation Plans (SIPs) that set statewide NOx budgets for the ozone season, aiming to reduce NOx emissions and improve air quality.

ADD THE FOLLOWING FOR NOx SIP Call-SUBJECT SOURCES

{LIST EU ID(s)} is / are currently subject to the requirements of the NOx SIP Call. The facility is subject to 40CFR Part 97 for the monitoring and reporting requirements.

OR

No emission units at the stationary source OR site {Select one} are subject to the NOx SIP Call.

Periodic Monitoring

ALWAYS INCLUDE THIS PARAGRAPH

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

USE TABLE TO LIST MONITORING ON CONTROL DEVICES OR DELETE THE SENTENCE BELOW AND THE TABLE IF NONE.

The following table identifies processes with periodic monitoring to show that control devices are properly operated and maintained in order to continuously meet an emission limit or standard.

Processes with Periodic Monitoring

Emission Unit ID	Description of Emission Unit and Control	Continuous Emission Monitoring	Parametric Monitoring
EUBOILER1	Natural gas-fired boiler with selective catalytic reduction (SCR) to control NO_X emissions	CEMS to measure NO_X emissions	
EUMATERIAL	Material handling system with a dry filter baghouse to control particulate emissions		Pressure drop monitoring across the baghouse.

Compliance Assurance Monitoring (CAM)

ALWAYS INCLUDE THIS PARAGRAPH

Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64 is intended to provide a reasonable assurance of compliance with the emission limit(s) for emission units with an air pollution control device. Monitoring is done to show that control devices are properly operated and maintained in order to continuously maintain the control efficiency to meet an emission limit or standard.

IF THE SOURCE HAS AT LEAST ONE CONTROLLED EMISSION UNIT SUBJECT TO CAM RULE, USE THE **TABLE** BELOW FOR **EACH EMISSION UNIT/FLEXIBLE GROUP** WITH EMISSION LIMIT(S) SUBJECT TO CAM (EMISSION UNIT USES THE CONTROL DEVICE TO ACHIEVE COMPLIANCE WITH EMISSION LIMIT AND POTENTIAL PRE-CONTROL EMISSIONS OF THE POLLUTANT ARE GREATER THAN THE MAJOR SOURCE THRESHOLD LEVEL).

IF THE CAM PLAN HAS SPECIFIED **PRESUMPTIVELY ACCEPTABLE MONITORING** (PAM, MONITORING FOR POLLUTANTS IN AN NSPS OR MACT PROMULGATED AFTER 11-15-1990), USE THE TABLE BELOW FOR EACH EMISSION UNIT/FLEXIBLE GROUP WITH EMISSION LIMIT(S) SUBJECT TO CAM THAT INCLUDES PAM. CAM TEMPLATE LANGUAGE IS STILL NEEDED IN THE ROP. MONITORING LANGUAGE IN THE ROP SHOULD INCLUDE UNDERLYING APPLICABLE REQUIREMENTS FROM 40 CFR PART 64 AS WELL AS FROM THE NSPS OR MACT.

LIST EACH POLLUTANT AND EMISSION LIMIT THAT IS SUBJECT TO CAM ON A SEPARATE LINE.

IDENTIFY THE UARs FOR THE CAM-SUBJECT POLLUTANT EMISSION LIMIT.

LIST THE CONTROL EQUIPMENT THAT APPLIES FOR THAT POLLUTANT.

GIVE A BRIEF DESCRIPTION OF THE MONITORING FOR THAT CAM-SUBJECT POLLUTANT AND THE REASON(S) IT WAS CHOSEN. INCLUDE THE MONITORING RANGE.

LIST THE EMISSION UNIT/FLEXIBLE GROUP THAT CONTAINS CAM LANGUAGE.

TO BE CONSIDERED PRESUMPTIVELY ACCEPTABLE MONITORING (PAM) FOR CAM, THE MONITORING MUST BE FROM AN NSPS OR MACT (POST 11-15-1990) AND MEET THE REQUIREMENTS. IF THIS IS TRUE, EXPLAIN THE PAM BELOW.

The pollutant specific emission units listed in the table below have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring (CAM) rule pursuant to 40 CFR Part 64.

Emission Units/Flexible Groups subject to CAM

Emission Unit /Flexible Group ID	Pollutant/ Emission Limit	Pre-Control Emissions (tpy)	Post-Control Emissions (tpy)	Control Equipment	Monitoring Indicator (Include Monitoring Range)

BRIEFLY SUMMARIZE THE CAM PLAN BELOW AND HOW THE CAM APPROACH ASSURES COMPLIANCE.

OR

No emission units have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring (CAM) rule pursuant to 40 CFR Part 64 because all emission units at the stationary source OR site {Select one} either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds or meet the CAM exemption for a continuous compliance determination method.

Streamlined/Subsumed Requirements

ALWAYS INCLUDE THIS PARAGRAPH

A subsumed requirement is one that is included in another special condition of the ROP. All subsumed requirements are enforceable under the streamlined requirement that subsumes them.

USE TABLE TO LIST ANY STREAMLINED/SUBSUMED REQUIREMENTS OR DELETE THE SENTENCE BELOW AND THE TABLE IF NONE.

The table listed below explains any streamlined/subsumed requirements included in the ROP pursuant to Rules 213(2) and 213(6).

In the Streamlined Limit/Requirement column, list the regulatory citation(s) (underlying applicable requirements) and the actual limit(s) or requirement(s) that is/are the most stringent. In the Subsumed Limit/Requirement column, list the regulatory citation(s) (underlying applicable requirements) and the actual limit(s) or requirement(s) that is/are less stringent. In the Stringency Analysis column, include as much detail as necessary to explain why the streamlined limit/requirement is more stringent than the subsumed limit/requirement, considering different units of measurement, averaging times, etc. Alternatively, include all the items listed in the table below in a non-table format. For an example of the table, see the ROP Manual Tab 4.G, "Staff Guidance on Streamlined/Subsumed Requirements in ROPs."

Streamlined/Subsumed Requirements

Emission Unit/Flexible Group ID	Special Condition Number	Streamlined Limit/ Requirement	Subsumed Limit/ Requirement	Analysis of why limit/ requirement could be streamlined and subsumed

OR

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

Processes Not Included in the Draft ROP

PICK ONE

The following table identifies activities that need to be listed in an ROP application, however, are considered exempt processes that are not included in the ROP pursuant to Rule 212(4). These processes are not subject to any process-specific emission limits or standards.

Processes not in the ROP

Emission Unit ID	Description of Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation
EUHEATERS	Two 100,000 BTU/hr natural gas-fired space heaters	Rule 212(4)(c)	Rule 282(2)(b)(i)

OR

There were no PTI exempt processes listed in the ROP application pursuant to Rule 212(4) that were not included in the Draft ROP.

Draft ROP Terms/Conditions Not Agreed to by Applicant

PICK ONE

The table below lists terms and/or conditions of the draft ROP that the AQD and the applicant did not agree upon and outlines the applicant's objections pursuant to Rule 214(2). The terms and conditions that the AQD believes are necessary to comply with the requirements of Rule 213 shall be incorporated into the ROP.

Conditions not agreed to

Emission Unit/ Flexible Group ID	Permit Term(s) and/or Condition(s) in Dispute	Applicant's Objection	AQD Response

{ALTERNATIVELY, A SHORT DESCRIPTION OF AQD'S RATIONALE FOR KEEPING THOSE CONDITIONS MIGHT BE INCLUDED WITHOUT USING THE TABLE FORMAT}

OR

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

DISCUSS ANY ENFORCEMENT ISSUES SINCE THE LAST ROP ISSUANCE AND ANY COMPLAINTS THAT HAVE LEAD TO ENFORCEMENT ACTION (VNS). INCLUDE SIGNIFICANT VNS, AS WELL AS ESCALATED ENFORCEMENT ACTION(S) AND WHETHER THERE IS A COMPLIANCE SCHEDULE INCLUDED IN APPENDIX 2 OF THE ROP. SEE ROP MANUAL, SECTION 4.B.1 STAFF REPORT INSTRUCTIONS AND SECTION 4.J FOR FURTHER INFORMATION.

PICK ONE

The AQD finds that the stationary source OR site {Select one} is expected to be in compliance with all applicable requirements at the time of issuance of the ROP except for requirements listed in Appendix 2. The table in Appendix 2 contains a Schedule of Compliance developed pursuant to Rule 119(a)(i). The applicant must adhere to this schedule and provide the required certified progress reports at least semiannually or in accordance with the schedule in the table. A Schedule of Compliance for any applicable requirement that the source is not in compliance with at the time of ROP issuance is supplemental to, and shall not sanction non-compliance with, the applicable requirements on which it is based.

OR

The AQD finds that the stationary source OR site {Select one} is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by EGLE, AQD

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. All comments received during the public comment period will be considered prior to a decision being made. The delegated decision maker for the AQD is [Name], [Title]

The final determination to approve, approve with modifications, or deny the proposed ROP will be based on the contents of the ROP Application, a judgment that the stationary source OR site {Select one} will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

Section 3: Frequently Used State and Federal Regulations

These tables list the most frequently used state and federal air regulations. Not all regulations listed may be applicable in each case. Please refer to the permit conditions to determine which regulations apply.

STATE AIR REGULATIONS

State Rule	Description of State Air Regulations
R 336.1201 (Rule 201)	Requires a Permit to Install for new or modified equipment that emits, or could emit, an air pollutant or contaminant. However, there are other rules that allow smaller emission sources to be installed without a permit (see Rule 279 through Rule 291 below). Rule 201 also states that the Department can add conditions to a permit to assure the air laws are met.
R 336.1205 (Rule 205)	Outlines the permit conditions that are required by the federal Prevention of Significant Deterioration (PSD) Regulations and/or Section 112 of the federal Clean Air Act. Also, the same types of conditions are added to a permit when a plant is limiting pollutant air emissions to legally avoid these federal requirements. (See the Federal Regulations table for more details on PSD.)
R 336.1210 (Rule 210) to R336.1218 (Rule 218)	Rules for the ROP Program including applicability, applications, content, approval, consolidation, modification, renewal, and reopenings.
R 336.1224 (Rule 224)	New or modified equipment that emits toxic air contaminants must use the Best Available Control Technology for Toxics (T-BACT). The T-BACT review determines what control technology must be applied to the equipment. A T-BACT review considers energy needs, environmental and economic impacts, and other costs. T-BACT may include a change in the raw materials used, the design of the process, or add-on air pollution control equipment. This rule also includes a list of instances where other regulations apply and T-BACT is not required.
R 336.1225 (Rule 225) to R 336.1232 ((Rule 232)	The ambient air concentration of each toxic air contaminant emitted from the project must not exceed health-based screening levels. Initial Risk Screening Levels (IRSL) apply to cancer-causing effects of air contaminants and Initial Threshold Screening Levels (ITSL) apply to non-cancer effects of air contaminants. These screening levels, designed to protect public health and the environment, are developed by Air Quality Division toxicologists following methods in the rules and the United States Environmental Protection Agency (USEPA) risk assessment guidance.
R 336.1280 (Rule 280) to R 336.1291 (Rule 291)	These rules list equipment to processes that have very low emissions and do not need to get an Air Use permit. However, these sources must meet all requirements identified in the specific rule and other rules that apply.
R 336.1301 (Rule 301)	Limits how air emissions are allowed to look at the end of a stack. The color and intensity of the color of the emissions is called opacity.

STATE AIR REGULATIONS

State Rule	Description of State Air Regulations
R 336.1331 (Rule 331)	The particulate emission limits for certain sources are listed. These limits apply to both new and existing equipment.
R 336.1370 (Rule 370)	Material collected by air pollution control equipment, such as dust, must be disposed of in a manner, which does not cause more air emissions.
R 336.1401 (Rule 401) and R 336.1402 (Rule 402)	Limit the sulfur dioxide emissions from power plants and other fuel burning equipment.
R 336.1601 (Rule 601) to R 336.1651 (Rule 651)	Volatile organic compounds (VOCs) are a group of chemicals found in such things as paint solvents, degreasing materials, and gasoline. VOCs contribute to the formation of smog. The rules set VOC limits or work practice standards for existing equipment. The limits are based upon Reasonably Available Control Technology (RACT). RACT is required for all equipment listed in R 336.1601 through 336.1651.
R 336.1702 (Rule 702)	New equipment that emits VOCs is required to install the Best Available Control Technology (BACT). The technology is reviewed on a case-by-case basis. The VOC limits and/or work practice standards set for a particular piece of new equipment cannot be less restrictive than the Reasonably Available Control Technology (RACT) limits for existing equipment outlined in R 336.1601 through 336.1651.
R 336.1801 (Rule 801)	Nitrogen oxide emission limits for larger boilers and stationary internal combustion engines are listed.
R 336.1901 (Rule 901)	Prohibits the emission of an air contaminant in quantities that cause injurious effects to human health and welfare, or prevent the comfortable enjoyment of life and property. As an example, a violation may be cited if excessive amounts of odor emissions were found to be preventing residents from enjoying outdoor activities.
R 336.1902 (Rule 902)	Adopts standards by reference including provisions of 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS); 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP); and 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories for federal air pollutant regulations from stationary sources.
R 336.1910 (Rule 910)	Air pollution control equipment must be installed, maintained, and operated properly.
R 336.1911 (Rule 911)	When requested by the AQD, a facility must develop and submit a malfunction abatement plan (MAP). This plan is to prevent, detect, and correct malfunctions and equipment failures.
R 336.1912 (Rule 912)	A facility is required to notify the AQD if a condition arises which causes emissions that exceed the allowable emission rate in a rule and/or permit.

STATE AIR REGULATIONS

State Rule	Description of State Air Regulations
R 336.2001 (Rule 1001) to R 336.2060 (Rule 1060)	Allow the AQD to request that a facility test its emissions and to approve the protocol used for these tests.
R 336.2501 (Rule 1501) to R 336.2514 (Rule 1514)	Regulates mercury emissions from any stationary coal-fired electric generating unit (EGU) serving a generator with a nameplate capacity of more than 25 megawatts producing electricity for sale. The program begins January 1, 2015 and contains provisions for existing and new EGUs. Mercury program eligibility provisions and prohibitions, demonstration plans, testing, monitoring, record keeping, and reporting are all part of the rule.
R 336.2801 (Rule 1801) to R 336.2804 (Rule 1804) Prevention of Significant Deterioration (PSD) of Air Quality	The PSD rules allow the installation and operation of large, new sources and the modification of existing large sources in areas that are meeting the National Ambient Air Quality Standards (NAAQS). The regulations define what is considered a large or significant source, or modification. In order to assure that the area will continue to meet the NAAQS, the permit applicant must demonstrate that it is installing the Best Available Control Technology (BACT). By law, BACT must consider the economic, environmental, and energy impacts of each installation on a case-by-case basis. As a result, BACT can be different for similar facilities. In a PTI application, the applicant identifies all air pollution control options available, the feasibility of these options, the effectiveness of each option, and why the option proposed represents BACT. As part of its evaluation, the AQD verifies the applicant's determination and reviews BACT determinations made for similar facilities in Michigan and throughout the nation.
R 336.2901 (Rule 1901) to R 336.2903 (Rule 1903) and R 336.2908 (Rule 1908) New Source Review for Major Sources Impacting Nonattainment Areas	Applies to new "major stationary sources" and "major modifications" as defined in R 336.2901. These rules contain the permitting requirements for sources located in nonattainment areas that have the potential to emit large amounts of air pollutants. To help the area meet the NAAQS, the applicant must install equipment that achieves the Lowest Achievable Emission Rate (LAER). LAER is the lowest emission rate required by a federal rule, state rule, or by a previously issued construction permit. The applicant must also provide emission offsets, which means the applicant must remove more pollutants from the air than the proposed equipment will emit. This can be done by reducing emissions at other existing facilities. As part of its evaluation, the AQD verifies that no other similar equipment throughout the nation is required to meet a lower emission rate and verifies that proposed emission offsets are permanent and enforceable.

FEDERAL AIR REGULATIONS

Citation	Description of Federal Air Regulations or Requirements
Section 109 of the Clean Air Act - National Ambient Air Quality Standards (NAAQS)	The USEPA has set maximum permissible levels for seven pollutants. These NAAQS are designed to protect the public health of everyone, including the most susceptible individuals, children, the elderly, and those with chronic respiratory ailments. The seven pollutants, called the criteria pollutants, are CO, lead, NOx, ozone, PM10, PM2.5, and SO_2. Portions of Michigan are currently in nonattainment for either ozone or SO_2. Furthermore, in Michigan, State Rules 336.1225 to 336.1232 are used to ensure the public health is protected from other compounds.
40 CFR 51, Appendix S - Emission Offset Interpretive Ruling	Appendix S applies during the interim period between nonattainment designation and USEPA approval of a SIP that satisfies nonattainment requirements specified in Part D of the federal Clean Air Act. Appendix S would apply in nonattainment areas where either no nonattainment permit rules apply or where the existing state rules are less stringent than Appendix S.
40 CFR 52.21 - Prevention of Significant Deterioration (PSD) Regulations	The PSD regulations allow the installation and operation of large, new sources and the modification of existing large sources in areas that are meeting the NAAQS. The regulations define what is considered a large or significant source, or modification. In order to assure that the area will continue to meet the NAAQS, the permit applicant must demonstrate that it is installing the Best Available Control Technology (BACT). By law, BACT must consider the economic, environmental, and energy impacts of each installation on a case-by-case basis. As a result, BACT can be different for similar facilities. In a PTI application, the applicant identifies all air pollution control options available, the feasibility of these options, the effectiveness of each option, and why the option proposed represents BACT. As part of its evaluation, the AQD verifies the applicant's determination and reviews BACT determinations made for similar facilities in Michigan and throughout the nation.
40 CFR 60 - Standards of Performance for New Stationary Sources (NSPS)	The USEPA has set national standards for specific sources of pollutants. These New Source Performance Standards (NSPS) apply to new or modified equipment in a particular industrial category. These NSPS set emission limits or work practice standards for over 60 categories of sources.
40 CFR 61 - National Emission Standards for Hazardous Air Pollutants (NESHAP)	The USEPA has set national standards for specific sources of pollutants. The National Emission Standards for Hazardous Air Pollutants (NESHAP) apply to new or modified equipment in a particular industrial category. These NESHAPs set emission limits or work practice standards for Asbestos, Benzene, Beryllium, Coke Oven Emissions, Inorganic Arsenic, Mercury, Radionuclides, and Vinyl Chloride (originally published listed HAPs) from sources.

FEDERAL AIR REGULATIONS

Citation	Description of Federal Air Regulations or Requirements
40 CFR 62 - Approval and Promulgation of State Plans for Designated Facilities and Pollutants	The USEPA has set forth the approval and disapproval of State plans for the control of pollutants and facilities under Section 111(d), and Section 129 as applicable, of the federal Clean Air Act, and the promulgation of Federal plans (e.g., 40 CFR 62 - Federal Plan Requirements for Municipal Solid Waste Landfills that commenced construction on or before July 17, 2014 and have not been modified or reconstructed Since July 17, 2014).
40 CFR 63 - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories	The USEPA has set national standards for specific sources of pollutants. The National Emission Standards for Hazardous Air Pollutants (NESHAP) (a.k.a. Maximum Achievable Control Technology (MACT) standards) apply to new or modified equipment in a particular industrial category. These NESHAPs set emission limits or work practice standards for over 100 categories of sources.
40 CFR 64 - Compliance Assurance Monitoring (CAM)	Compliance assurance monitoring (CAM) is intended to provide a reasonable assurance of compliance with applicable requirements under the federal Clean Air Act for large emission units that rely on a pollution control device for compliance. Monitoring is conducted to determine that control devices are properly operated and maintained so that they continue to achieve a level of control that complies with applicable requirements. Stationary sources may be subject to CAM if they are required to obtain an ROP and have an emission unit for which all the following conditions are met: the emission unit uses a control device to achieve compliance with a federally enforceable emission limitation or standard for the applicable pollutant, the emission unit has potential pre-control emissions which are over 100 percent of the major source threshold amount (at a level considered to be major under the ROP Program) for the applicable pollutant, the emission limitation or standard does not meet a CAM exemption.