



MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

Air Quality Division

Renewable Operating Permit (ROP)

Shell Instructions for Sectioned ROPs

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Overview

The following procedures shall be used as guidance for constructing a Sectioned ROP. The purpose of sectioning an ROP is 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 Conditions in Part A. Sections should not be created for separating Emission Units (EU)s, Flexible Groups (FG)s, or buildings. Determining whether an ROP should be sectioned should be done on a case-by-case basis as part of the technical review process.

STEP 1: Should the ROP be sectioned?

Does the stationary source have more than one Responsible Official; or is there a special reason why the ROP should be sectioned?

- If YES, the ROP should be sectioned. (Proceed to Step 2.)
- If NO, the ROP should not be sectioned. (Use the standard ROP Shell Instructions.)

STEP 2: Are there any stationary Source-Wide applicable requirements?

Stationary Source-Wide requirements apply to the entire stationary source, which includes all Sections. Therefore, the Source-Wide Conditions should be identical for each Section in the ROP. An example of a stationary Source-Wide applicable requirement for a Sectioned ROP is a Source-Wide emission limit such as a Synthetic Minor limit on HAPs. Such a limit would apply to the entire stationary source.

If an ROP has more than one section, more than one Responsible Official, AND conditions that apply Source-Wide, you must include the following condition from the “Optional Requirements” portion of the ROP Shell General Conditions:

Each Responsible Official shall certify annually the compliance status of the stationary source with all stationary Source-Wide conditions. This certification shall be included as part of the annual certification of compliance as required in the General Conditions in Part A and Rule 213(4)(c). **(R 336.1213(4)(c))**

Add this condition to the Source-Wide Conditions under IX. Other Requirements.

STEP 3: How do I organize the ROP with Sections?

Each Section in the ROP will look like a stand-alone ROP. The exception is that there should only be **one** ROP Certificate (Approval Page), **one** Table of Contents and **one** Authority and Enforceability page for the entire ROP. Since each Responsible Official must certify compliance with all applicable requirements of their Section, including the general conditions in Part A, each Section in the ROP must include a copy of the general conditions in addition to stationary Source-Wide requirements, EU requirements, FG requirements, non-applicable requirements and appendices for the Section.

The following table provides details for organizing a Sectioned ROP. The left column gives the order in which the various parts of the ROP should be set-up. The right column provides comments and instructions regarding each part of the ROP.

Parts of the ROP	Comments
Permit Certificate	A Sectioned ROP should only have one Permit Certificate (approval page). NOTE: There should NOT be any reference to the Section # in the header on this page.
Table of Contents	A Sectioned ROP should only have one Table of Contents which encompasses all Sections. NOTE: There should NOT be any reference to the Section # in the header on this page.
Authority & Enforceability	A Sectioned ROP should only have one Authority & Enforceability Page. NOTE: There should NOT be any reference to the Section # in the header on this page.
Section 1	Create a section break at the end of the Authority & Enforceability page. (This page already has a page break at the end, you will keep this break as well.) This is done by clicking on >Layout, >Breaks, >Section Break>Next Page. After adding the section break, go into the header and add "Section 1" and the name of the section. In order to do so without affecting the previous header, make sure the "link to previous" button is NOT selected. This will be the page that introduces Section 1 . This page will precede the general conditions for Section 1. On this page, you will type the section number and name of the section (on the same line) in Arial 14 and defined as Heading 3. Highlight the sentence and set the line spacing for 36 pt before and 36 pt after (do not modify the Heading 3 for this spacing). (This should be the only information on this page.) This will allow the Table of Contents generator to recognize the section number. You will also have to change the header on the general conditions page. (SEE EXAMPLE 1)

Parts of the ROP	Comments
Section 1, Part A	Each Section should include a complete copy of the general conditions.
Section 1, Part B	If there are Source-Wide requirements, they should be identical for each Section. A copy of Part B should be included in each Section.
Section 1, Part C	Each section will have its own separate Emission Unit Summary Table. List only the EUs in Section 1. Include conditions for EUs in Section 1. If any EU in Section 1 has the same name as an EU in another section (e.g., EUBOILER) place -1, -2 etc. at the end of the name to reflect the section number (e.g., EUBOILER-1, EUBOILER-2 etc.).
Section 1, Part D	Each section will have its own separate Flexible Group Summary Table. List only the FGs in Section 1. Include conditions for FGs in Section 1. If any FG in Section 1 has the same name as an FG in another section (e.g., FGCOLDCLEANER) place -1, -2 etc. at the end of the name to reflect the section number (ex. FGCOLDCLEANER-1, FGCOLDCLEANER-2 etc.).
Section 1, Part E	List only the non-applicable requirements for Section 1.
Section 1, Appendices	Include the complete set of appendices for each Section. The Appendices for Section 1 should be numbered 1-1, 2-1, 3-1, 4-1, etc.
Section 2, etc.	Create a section break after the last appendix in Section 1. Follow instructions above for Section 1 to create a page that introduces Section 2.
Parts A, B, C, D, E; Appendices.	Same as above. Use EU{ID}-2, FG{ID}-2 if the same name occurs in multiple sections, and number Appendices 1-2, 2-2, 3-2, etc.

EXAMPLE 1:

→ → → → → **WORKING-DRAFT** → ROP-No: ROP0000123-v2.0¶
Expiration-Date: ¶
PTI-No: SWPTI0000123-v2.0¶

AUTHORITY AND ENFORCEABILITY¶

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) or his or her designee.¶

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a Source-Wide group. Special conditions are identified in Parts B, C, D and/or the appendices.¶

In accordance with Rule 213(2)(a), all underlying applicable requirements are identified for each ROP term or condition. All terms and conditions that are included in a PTI are streamlined, subsumed and/or is state-only enforceable will be noted as such.¶

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.¶

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.¶

¶ Section Break (Next Page) ¶

Insert Section Break here

→ → → → → **WORKING-DRAFT** → ROP-No: ROP0000123-v2.0¶
Section 1 - Iron and Steel Manufacturing Operations → Expiration-Date: ¶
PTI-No: SWPTI0000123-v2.0¶

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SECTION 1 -- IRON AND STEEL MANUFACTURING OPERATIONS¶

¶

..... Page Break ¶

Insert Page Break here.

Make sure link to previous button is not on for header and add Section information to header.

This is your section cover page. Arial 14,

→ → → → → **WORKING-DRAFT** → ROP-No: ROP0000123-v2.0¶
Section 1 -- Iron and Steel Manufacturing Operations → Expiration-Date: ¶
PTI-No: SWPTI0000123-v2.0¶

A. GENERAL CONDITIONS¶

Permit Enforceability¶

- → All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (R 336.1213(5))¶
- → Those conditions that are hereby incorporated in a state-only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (R 336.1213(5)(a), R 336.1214a(5))¶
- → Those conditions that are hereby incorporated in a federally enforceable Source-Wide PTI pursuant to Rule 201(2)(c) are designated by footnote two. (R 336.1213(5)(b), R 336.1214a(3))¶

You will need to change this header to match sectioned header.