



MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

Air Quality Division

Renewable Operating Permit Processing and Workflow - Reopenings

Revised

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Reopening (Rule 217(2))

OVERVIEW

Rule 217(2) describes reopening of an ROP for cause. A reopening must meet one of the following criteria:

- (1) To incorporate a new applicable requirement issued or promulgated after the issuance of the ROP if 3 or more years remain in the term of the permit. This must occur as expeditiously as possible, but not later than 18 months after promulgation of the applicable requirement.
- (2) To incorporate new applicable standards and requirements for affected sources pursuant to Title IV of the Clean Air Act.
- (3) If the Department determines that the permit contains a material mistake, the information required by any applicable requirement was omitted, or that inaccurate statements were made in establishing the emission limitations or standards or the terms and conditions of the permit.
- (4) If the Department determines that the permit must be revised to ensure compliance with the applicable requirement.

A reopening can only affect those parts of the ROP for which cause to reopen exists. It is very important to emphasize that fact in the associated documents, especially in the letter to the company, the Public Notice and the Staff Report.

A. Reopening (REO) Notification

Staff	1. Create a Reopening submission using the Permit Change Form, a. Go to Permit Functional Area, and on the “In Effect” ROP, b. Left click the right ellipses and click on ‘View Permit Change Forms’, c. Click ‘Air Renewable Operating Permit (ROP) Reopening Form’ and fill out the form. d. Fill out and submit the form. Please Note: Only the changes identified in the reopening can be made to the ROP, so be specific. 2. Under the reopening submission, generate the document to reopen the ROP using <i>ROP Reopening Company Notification</i>.
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	a. If the REO involves a renewable non-ROP permit (e.g. Acid Rain Permit), address the letter to both the Responsible Official(s) (RO) and Designated Representatives(s) (DR). Contact Brian Carley if you need to confirm the current DR(s). Copy Brian on the letter. b. Save as {SRN} REO ROP Company Notification. 3. Mark the "Initiate reopening process (after 30-days)" workflow task as <i>Complete</i>. The notice must be provided at least 30 days in advance of the date that the ROP is to be reopened and specify the reasons for the reopening.
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B. Working Draft ROP

Prepare the Working Draft ROP

Staff	1. Make a copy of the existing ROP under the Reopening Submission and save as {SRN}_REO Working Draft_ROP##### v#.#_XX-XX-20XX. 2. Add "REO WORKING DRAFT" in the header of each page of the REO Working Draft, including the first page. On the ROP cover page, insert "Revision Date: {<i>date of approval</i>}" on a new line under the "Effective Date" if this is the first revision of this ROP. 3. MiEnviro will issue a new ROP version number. 4. Make the changes to the ROP that were specified in the notification to the company. If needed, insert the appropriate Optional Conditions from the ROP Shell template into the appropriate ROP table. If the REO involves a renewable non-ROP permit, insert that permit into the document as the appropriate appendix. 5. If reopening to add Acid Rain permit(s), assign the "Acid Rain and/or CSAPR" task in the workflow to the Acid Rain Permit (ARP) Writer. The ARP writer will notify the ROP Writer when the documents are ready. CSAPR template language and Acid Rain permit(s) are to be inserted as appendices in the Working Draft ROP. This will also make sure that the Acid Rain permit has been submitted. 6. Update the Table of Contents by either right clicking on the Table of Contents and choosing "Update field"/"update entire table" or pressing F9 and choosing "update entire table."
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	7. Again, save the REO Working Draft as {SRN}_REO Working Draft_ROP##### v#.#_XX-XX-20XX.
Secretary	8. Finalize the REO Working Draft ROP by formatting and correcting any errors. Note: If sectioned ROP, refer to the ROP Shell Instructions for Sectioned ROPs (ROP Manual 3.B.3) to be sure sectioning has been done correctly. a. Make sure to check tracked changes and accept all changes. No tracked changes should be left in the Working Draft ROP. Send back to Staff as necessary to clean up. b. Make sure to check for any comments and delete all comments. No comments should be left in the Working Draft ROP unless left for the company to address. Send back to Staff as necessary to clean up. c. Update the Table of Contents by either right clicking on the Table of Contents and choosing "Update field"/"update entire table" or pressing F9 and choosing "update entire table." d. Save document as {SRN}_REO Working Draft_ROP##### v#.#_XX-XX-20XX (date document being sent to the Company).

Prepare the Working Draft Staff Report

Staff	1. Make a copy of the existing Staff Report under the Reopening Submission and save as {SRN}_REO Working Draft Staff Report_ROP##### v#.#_XX-XX-20XX. 2. Generate the <i>ROP SR REO Draft</i> document and insert into the Staff Report at the end of the document. Include appropriate detail regarding the changes. 3. Update the Table of Contents by either right clicking on the Table of Contents and choosing "Update field"/"update entire table" or pressing F9 and choosing "update entire table." 4. Save as {SRN}_REO Working Draft Staff Report_ROP##### v#.#_XX-XX-20XX. 5. Assign the "Supervisor Review" task in the workflow to your Supervisor including review of the <i>Technical Review Notes, Working Draft Staff</i>
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	<i>Report, Working Draft ROP, and Permit Schedules.</i> Your Supervisor may appreciate if you include a due date for the task. 6. After Supervisor review is completed and all changes as a result of that review have been incorporated, assign the “Send working draft conditions to applicant” workflow task to the secretary. Add a due date so it will be easier to find on their My Tasks page. 7. Make sure the “Supervisor Review” and “District Review” workflow tasks are marked as <i>Complete</i>.
Secretary	8. Finalize the Working Draft Staff Report by formatting and correcting any errors. a. Make sure to check for tracked changes and accept all changes. No tracked changes should be left in the Staff Report. Send back to Staff as necessary to clean up. b. Make sure to check for any comments and delete all comments. No comments should be left in the Staff Report. Send back to Staff as necessary to clean up. c. Update the Table of Contents by either right clicking on the Table of Contents and choosing “Update field”/“update entire table” or pressing F9 and choosing “update entire table.” d. Save document as {SRN}_REO Working Draft Staff Report_ROP##### v#.#_XX-XX-20XX (date document being sent to the Company).

Prepare the Letter to the Company

Secretary	1. Generate the Letter to the company using <i>ROP Letter to Company for WD Review, 30&45 Day Notice</i>. a. Make sure the letter is addressed to the Responsible Official and contacts in the ROP application are copied in the cc:s. b. If the ROP includes CSAPR requirements and/or an Acid Rain permit(s), make sure to include that paragraph in the letter and copy the Designated Representative on the letter. 2. Finalize the Letter by formatting and correcting any errors. a. Save document as {SRN}_REO Letter with Working Draft_ROP##### v#.#_XX-XX-20XX (date document being sent to the Company) b. Have Staff review the letter.
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Send Documents to the Company

Secretary	1. Generate the Email Body using <i>Email Body – ROP Letters</i>. a. Save document as <i>Email Body – ROP Letters – REO WD</i> (you can delete this after sending to company). c. Email documents to the Responsible Official and copy any contacts in the ROP application. 2. Make sure to copy the Permit Writer(s), Compliance Manager, and appropriate Supervisors. a. When sending attached documents, make sure to uncheck the “Attach pdf version of documents” button so the company will receive Microsoft Word versions they can edit. 3. Mark the “Send working draft conditions to the applicant” workflow task as <i>Complete</i>. Make sure the Security Classification is <i>Internal</i> for all REO Working Draft documents sent to the Company.
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Create New Documents for Draft ROP and Staff Report

Secretary	1. Make a copy of the Working Draft ROP. (See Internal User Guide, Page 40 for instructions on how to copy a document.) a. Save as {SRN}_REO Draft_ROP##### v#.#_XX-XX-20XX b. Change the header from “REO WORKING DRAFT” to “REO DRAFT / PROPOSED,” including the first page. 2. Make a copy of the Working Draft Staff Report. a. Save as {SRN}_REO Draft Staff Report_ ROP##### v#.#_XX-XX-20XX 3. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>. NOTE: This is a good time to check with Staff if the Language Proficiency Analysis indicated translation was needed and what language(s) the public notice will need to be translated into.
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Company Comments

Staff	Review any company comments received. Comments from the company may be addressed by revisions to the Working Draft ROP (making sure to use the DRAFT ROP document) upon concurrence of district staff and supervisor. If the company and Department cannot agree on the conditions, do NOT incorporate the company’s version of those conditions. Discuss these issues with the District Supervisor. Offer to list terms and/or conditions of the draft ROP that the AQD and the applicant did not agree upon and outline the applicant’s objections to those conditions along with the AQD response in the Staff Report.
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C. Draft ROP and 30-Day Public Comment Period

Prepare the Draft ROP

Staff	1. If applicable, make appropriate changes in response to comments in the DRAFT ROP document named {SRN}_REO Draft_ROP##### v#.#_XX-XX-20XX). Do not make any changes in the Final Working Draft ROP document. 2. Check the ROP for any required management and work practice plans and make sure you have that plan in the Submission documents for posting. 3. The plans must be posted or at a minimum copied under the Submission record for it to be included in the Public Comment Event.
Secretary	4. Finalize the Draft ROP by formatting and correcting any errors. a. Check that the header has “REO DRAFT / PROPOSED,” including the first page. b. If the reopening is to add an Acid Rain permit(s), check that “WORKING DRAFT” on the Acid Rain permit(s) is changed to “DRAFT / PROPOSED.” If not adding an Acid Rain permit, do not make any changes to it. c. Make sure to check tracked changes; accept all changes and stop tracking. (Confirm with Staff and have them clean up any tracked changes.) d. Make sure to check for any comments and delete all comments. (Confirm with Staff and have them clean it up.) e. Update the Table of Contents by either right clicking on the Table of Contents and choosing “Update field”/“update entire table” or pressing F9 and choosing “update entire table.” f. Save document as {SRN}_REO Draft_ROP##### v#.#_XX-XX-20XX. The date should be the date that the 30-day comment period starts. 5. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>.

Prepare the Draft Staff Report

Staff	1. If applicable, make appropriate changes (e.g., company comments and district responses) using the document named {SRN}_REO Draft Staff Report_ROP##### v#.#_XX-XX-20XX. Do not change anything in the Final Working Draft Staff Report. 2. Mark the “Review comments for changes; update draft conditions and staff report” workflow task as <i>Complete</i>. 3. Assign the “Prepare documents needed for Public Comment...” workflow task to the secretary. Add a due date so it will be easier to find on their My Tasks page.
Secretary	4. Finalize the Draft Staff Report by formatting and correcting any errors. Make sure the date of the Public Comment period start date is on the cover as the Staff Report Date. a. Make sure the Start Date and End Date for the Public Comment Period are on the REO Addendum. b. Check tracked changes; accept all changes and stop tracking. (Confirm with Staff and have them clean up any tracked changes.) c. Check for any comments and delete all comments. (Confirm with Staff and have them clean up any tracked changes.) d. Update the Table of Contents by either right clicking on the Table of Contents and choosing “Update field”/”update entire table” or pressing F9 and choosing “update entire table.” e. Save document as {SRN}_REO Draft Staff Report_ROP##### v#.#_XX-XX-20XX (date public comment starting). The date should be the date that starts the 30-day comment period, which is determined when the EGLE Calendar notice is published and should not change. 5. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>. Note: The Staff Report CANNOT be changed once the 30-day public comment period commences. After the 30-day public comment period, any clarifications to the initial staff report must be made in the Staff Report Addendum.

Prepare the Public Notice Document

Secretary	1. Generate the Public Notice document using <i>PN-ROP Announcement for Reopening or Modification</i>. a. Finalize the document by formatting and correcting any errors. For the map follow instructions for the Public Notice Document Map Procedure. b. Save document as {SRN}_REO Public Notice_ROP#####v#.#_XX-XX-20XX (date public comment starting). 2. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>. Note: If translation is needed based on the Language Proficiency Analysis, contact the RCU DA to discuss the time frame needed and dates to be used for getting the document translated and for timing to get the calendar notice submitted. Note: Make sure to coordinate with the Acid Rain Permit Writer if adding an Acid Rain permit.
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Prepare the Calendar Announcement Document

Secretary	1. Decide on the start date for the public comment period. Make sure the 30-day public comment period will not end on a holiday or a weekend. If adding Acid Rain Permit(s), coordinate with the Acid Rain Permit Writer to synchronize the start and end dates with the public comment on Acid Rain permit(s). Consult the EGLE Calendar Production Schedule for the start date. (See T:\ADM\CALENDAR\{current year} Calendar Schedule.pdf). NOTE: If translation is needed for the Public Comment Document, make sure to allow 10 extra days before the date you wish the comment period to start before sending in the calendar announcement. 2. Generate the Calendar Announcement document using <i>PN-ROP EGLE Calendar Announcement</i>. a. Have Staff review the document and make any adjustments. b. Finalize the document by formatting and correcting any errors. c. Save document as {SRN}_REO EGLE Calendar
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	3. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>. 4. Mark the “Prepare documents needed for Public Comment...” workflow task as <i>Complete</i>. 5. Assign the “<i>Send calendar notice</i>” workflow task to the RCU workgroup and the RCU DA if not auto assigned. The RCU DA will submit the calendar notice to the calendar editor.
RCU DA	6. Submit Calendar Notice to the Editor. 7. Mark the “<i>Send Calendar Notice</i>” workflow task as <i>Complete</i> after submitting the calendar notice to the editor.

Prepare a Newspaper Notice (if necessary)

Secretary	1. If it is necessary for the permit to be noticed in a newspaper, prepare the newspaper email using <i>PN - ROP Newspaper Email Notification</i>. 2. For information regarding what newspaper to use and who to contact, go to T:PMT\Public Participation\Newspaper\Newspaper Publication info.xlsx. 3. If you do not see a newspaper in the affected city or township on the list, you should contact the city or township in the affected area to see what newspaper they publish their public notices in and get a contact person to email. Add the contact information to the publication list or give the information to the AQD Public Involvement and Permitting Unit and they will add it to the publication list. 4. Save as {SRN}_REO Newspaper. 5. Make sure that the <i>PN-ROP Announcement for Reopening or Modification</i> includes information about where and when the public hearing will be held if requested. 6. After final approval from the District Supervisor, send the email to the newspaper and copy the AQD Administration Section Liaison. Make sure to attach a copy of the word version of the public notice to this email. The email requests that a confirmation email and a tear sheet be returned from the newspaper, print for the facility file. If you do not hear from the newspaper call them for confirmation.
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	7. Multiple draft ROPs for non-controversial sources located in the same geographic area may be noticed at the same time. Consolidation of several non-controversial sources may assist the district in expediting the public participation process. Hearings will only be held for those sources in the notice for which a hearing has specifically been requested.
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Prepare the Letter to the Company

Secretary	1. Generate the Letter to the company using <i>ROP Letter to Company for WD Review, 30&45 Day Notice</i>. a. Make sure the letter is addressed to the Responsible Official and any contacts listed in the application are copied. b. Use the paragraphs for the “Draft ROP & 30-Day Public Comment Period & concurrent 45-Day EPA review period.” c. If reopened to add an Acid Rain permit(s), make sure to include that paragraph in the letter and copy the Designated Representative on the letter. Otherwise, do not include Acid Rain paragraph. 2. Finalize the Letter by formatting and correcting any errors. a. Save document as {SRN}_REO Letter with Draft_ROP#####v#.#_XX-XX-20XX (date public comment starting) b. Have Staff review the letter. 3. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>.
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Prepare the Letter to Interested Parties (if appropriate)

Staff	1. Based on experience with the public regarding the facility, some interested persons may want to be notified of the draft ROP. If this is the case, compile a mailing list and use this list throughout the public participation process. 2. Prepare a letter to those interested parties announcing the 30-day public comment period and explaining the permit process using <i>PN - ROP Interested Party Letter</i>. The letter will refer them to the AQD website to view the Draft ROP and Staff Report or to contact the district office for a printed copy. Depending on the situation, you may choose to send copies with the letter. 3. Save as {SRN}_REO Interested Party Letter_ROP##### v#. #_XX-XX-20XX.
Secretary	4. Finalize the letter and add the date to the name above (date public comment starting) 5. Send Letter to all parties on the mailing list.

Prepare the 30-Day Email notification to EPA

Secretary	1. Prepare the 30-day and 45-day (starting concurrently) email for EPA using <i>PN - ROP EPA 30 Day Email Notification</i> and save as {SRN}_REO 30-45 Day Email. 2. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>.
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Public Comment Period

RCU DA	1. If translation of the Public Notice document is needed, send to the AQD Outreach Specialist and track on spreadsheet. 2. Review all REO Draft ROP documents and set the Security Classification to <i>Public</i> and the Status to <i>Final</i>. 3. Create Public Event. 4. Add information and hyperlinks to Title V Renewable Operating Permit (ROP) Public Notice Documents Web Page.
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	5. Send 30-day and 45-day (starting concurrently) review period Email to EPA and copy all noted recipients and any affected States, Canadian Agencies, and/or Tribal Communities listed in Appendix A to inform them of the 30-day public comment period. Forward the email to EPA and others as follows: ➤ ogulei.david@epa.gov ➤ damico.genevieve@epa.gov ➤ reeson.isabelle@epa.gov ➤ myottb@michigan.gov ➤ brunnerj1@michigan.gov ➤ orentk@michigan.gov ➤ affected state(s), Canadian Agencies, and/or Tribal Communities from Appendix A ➤ district supervisor ➤ permit writer(s) EPA has agreed that their comments will be provided during the 30-day public comment period instead of waiting for the sequential 45-day review period. 6. Mark the “Public comment (30-day) – Create Event and Initiate” workflow task as <i>Complete</i>. a. Add the start and end dates of the public comment period in the comments field of this task.
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Send Documents to the Company (after RCU DA has made them final)

Secretary	1. Generate the Email Body using <i>Email Body – ROP Letters</i>. a. Save document as <i>Email Body – ROP Letters – REO Draft</i> (you can delete this after sending to company) 2. Email the Letter to the company. Make sure to copy the Permit Writer(s), Compliance Manager, and appropriate Supervisors as well as any site authorized representatives.
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Create New Document for Proposed ROP

Secretary	1. Make a copy of the REO Draft ROP. (See Internal User Guide, Page 40 for instructions on how to copy a document.) a. Save as "{SRN}_REO Proposed_ROP##### v#. #_XX-XX-20XX" 2. Make a copy of the REO Draft Staff Report. b. Save as "{SRN}_REO Proposed Staff Report_ ROP##### v#. #_XX-XX-20XX" 3. Generate the Staff Report Addendum and insert it into the Staff Report just before the Definitions Section. 4. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>.
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Preparing and holding a public hearing (if necessary)

Staff/Secretary	1. If a hearing is necessary based on comments received or requested, contact your supervisor to discuss procedures for setting up the hearing. See ROP Manual 4.D.2 for the "<i>ROP Public Hearing Checklist</i>." See ROP Manual 4.D.3 for the "<i>Guidance on conducting an ROP Public Hearing</i>," and ROP Manual 4.D.4 for the "<i>Example Fact Sheet for a Public Hearing</i>" which is handed out at public hearings. 2. Notify EPA and the company via email if a public hearing is to be held. 3. If a hearing is not necessary, cancel the room if one has been reserved.
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Response to Comments

Note: In addition to comments from citizens, the company and/or affected states, comments may be submitted by EPA during the public comment period. These comments may be sent by EPA to the Permit Writer, Supervisor, Field Operations Manager, and/or RCU DA via email.

Staff	1. After reviewing all comments, discuss with Supervisor and Decision-Maker (as necessary). Document changes and why the changes were or were not made. Refer to Appendix B for further guidance. 2. Create a response to comments received in the Staff Report Addendum.
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D. Proposed ROP and EPA 45-Day Review

Prepare the Proposed ROP

Staff	If Comments were received: 1. If applicable, incorporate comments from the company, EPA, the public, and/or affected states. If the permit writer does not agree with requested changes, do <u>not</u> incorporate the changes. Discuss these issues with the District Supervisor and/or Decision-Maker. 2. Provide proposed permit documents to Supervisor for review, and if changes to the REO Draft ROP, provide the {SRN}_REO Proposed_ROP##### v#. #_XX-XX-20XX to the company for review. 3. If comments are received or changes are identified as needed to the Draft ROP, the EPA 45-day review period will start over for the re-proposed ROP. If No Comments Were received: 4. The Draft ROP becomes the “official” Proposed ROP, and only 15-days are required to complete the EPA 45-day review period. 5. If reopened to add an Acid Rain Permit(s), contact the Acid Rain Permit Writer to verify that any Acid Rain permit(s) for this source is/are also ready to begin the 45-day EPA review period. Note: Comments received may need to be uploaded in the Public Notice Event Responses tab for the record if not submitted through the Public Notice Event.
Secretary	6. Finalize the Proposed ROP by formatting and correcting any errors a. Check that the header has “REO PROPOSED,” including the first page. b. If reopened to add an Acid Rain permit(s), change “REO DRAFT / PROPOSED” to “REO PROPOSED” on the Acid Rain permit(s) in Appendix 9. Otherwise do not change anything on the Acid Rain Permit. c. Make sure to check tracked changes; accept all changes and stop tracking.

	d. Make sure to check for any comments and delete all comments. e. Update the Table of Contents by either right clicking on the Table of Contents and choosing "Update field"/"update entire table" or pressing F9 and choosing "update entire table." f. Save document as {SRN}_REO Proposed <i>ROP##### v#.#_XX-XX-20XX</i> (date EPA 45-day review begins). 7. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>.
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Prepare the Staff Report and Addendum

Staff	1. If comments were received, generate an addendum and add to the Proposed Staff Report (if not already generated by the secretary when new document for Proposed was created). Refer to the Staff Report Instructions (ROP Manual 3.B.1) for specifics on creating the addendum. 2. Provide a summary in the Staff Report Addendum of significant public comments, including any received by EPA, with each comment being addressed and resolved by AQD. Identify any changes made to the Draft ROP in the addendum. Include any company objections to the Draft ROP in the addendum. 3. Provide proposed permit documents to Supervisor for review.
Secretary	4. If no comments are received, check that the Staff Report Addendum states no comments were received and no changes were made to the Draft ROP. 5. Finalize the Proposed Staff Report by formatting and correcting any errors. a. Make sure to check tracked changes; accept all changes and stop tracking. b. Make sure to check for any comments and delete all comments. c. Update the Table of Contents by either right clicking on the Table of Contents and choosing "Update field"/"update entire table" or pressing F9 and choosing "update entire table." d. Save document as {SRN}_REO Proposed Staff Report_<i>ROP##### v#.#_XX-XX-20XX</i> (date EPA 45-day review began if concurrent or begins for sequential).

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| | 6. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i> . |
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Prepare the Letter to the Company

Staff	(If substantive changes were made to the REO Draft ROP) 1. Generate the letter to the company using <i>ROP Letter to Company for WD Review, 30&45 Day Notice</i>. a. Make sure the letter is addressed to the Responsible Official. b. Use the template paragraph allowing the company 7 to 15 days to review the preliminary version of the proposed ROP and provide comments. c. If reopened to add an Acid Rain permit(s), make sure to include that paragraph in the letter and copy the Designated Representative on the letter. Otherwise do not add that paragraph. d. Save the letter as {SRN}_REO Letter with Proposed_ROP#####v#.#_XX-XX-20XX 2. Email a copy of the proposed ROP and the proposed Staff Report Addendum with the letter to the Responsible Official and the Designated Representative (if Acid Rain Permit added). Contact Acid Rain Permit Writer to obtain the current DR contact information if necessary. 3. If additional substantive comments related to the changes made are received from the company discuss with Supervisor, repeat Steps above. 4. Once the company understands the changes in the Proposed ROP, generate a new letter using <i>ROP Letter to Company for WD Review, 30&45 Day Notice</i>. a. Use the template paragraph indicating that the 45-day EPA review period has commenced and that the Proposed ROP and Staff Report are available on the website. If adding an Acid Rain permit(s), copy the DR on the letter. 5. Assign the “Prepare proposed documents...” workflow task to the secretary. 6. Mark the “Review comments for change; update to proposed...” workflow task as <i>Complete</i>.
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Secretary	(If substantive changes were made to the Draft ROP) 7. Finalize the letter by formatting and correcting any errors. a. Save document as {SRN}_REO Letter with Proposed_ROP##### v#.#_XX-XX-20XX (date EPA 45-day review begins for sequential) b. Have Staff review the letter and sign. 8. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>. (If NO substantive changes were made to Draft ROP) 9. No letter to the company will be generated. 10. Mark the “Prepare proposed documents...” workflow task as <i>Complete</i>. 11. Assign the “EPA Comment (45-day) - Initiated” task to the RCU DA. Put a note in the Comment field that 45-day is continuing or will be starting over.
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Prepare the Letter to interested parties

If applicable, create a letter to all those interested parties on the original mailing list as well as those who made comments on the Draft ROP, attended the public hearing, or expressed an interest during permit development.

Secretary	(If substantive changes were made to the Draft ROP) 1. Generate the letter using PN - <i>ROP Interested Party Letter</i>. This letter informs the public that the Proposed ROP has gone to EPA for 45-day review and explains there is no opportunity for public comment during this review. The letter will refer them to the AQD website to view the Proposed ROP and Staff Report or to contact the district office for a printed copy. 2. Save as {SRN}_REO Interested Party Letter_ROP##### v#.#_XX-XX-20XX. (date EPA 45-day review starting) (If NO substantive changes were made to Draft ROP) 3. No Letter to Interested Parties will be generated.
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Prepare the 45-Day Email notification to EPA (as needed)

Secretary	(If substantive changes were made to the REO Draft ROP, the ROP must be re-proposed) 1. Prepare the 45-day email for EPA using PN - <i>ROP EPA 45 Day Email Notification</i> and save as {SRN}_45 Day Email. 2. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>. (If NO substantive changes were made to REO Draft ROP, the 45-day EPA review will continue) 3. If continuing the EPA comment period, NO 45-Day email will be sent to EPA.
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Initiate the 45-day EPA review period

RCU DA	1. Review all Proposed ROP documents and set the Security Classification to <i>Public</i> and the Status to <i>Final</i>. 2. Add information and hyperlinks to Title V Renewable Operating Permit (ROP) Public Notice Documents Web Page. (If 45-day is starting over) 3. Send 45-day Email to EPA and copy all noted recipients. ➤ ogulei.david@epa.gov ➤ damico.genevieve@epa.gov ➤ reeson.isabelle@epa.gov ➤ myottb@michigan.gov ➤ brunnerj1@michigan.gov ➤ orentk@michigan.gov ➤ district supervisor ➤ permit writer(s) Note: The 45-day review period starts the day EPA has received the 45-day email and has access to the uploaded proposed ROP, Staff Report, and will end in 45 days (or when EPA indicates they are done with their review). If the ending date falls on a Holiday or weekend, use the date of the next business day.
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	(If 45-day is continuing from concurrent Draft) 4. Mark the “EPA Review (45 day) – Initiate” workflow task as <i>Complete</i>. Add comment with EPA review starting and ending dates.
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Send Documents to Company (after DA has made them final)

Secretary	(If substantive changes were made to the REO Draft ROP and the 45-day is starting over) 1. Generate the Email Body using <i>Email Body – ROP Letters</i>. a. Save document as <i>Email Body – ROP Letters – REO Proposed</i> (you can delete this after sending to company) 2. Email the Letter to the company. Make sure to copy the Permit Writer, Compliance Manager, and appropriate Supervisors as well as any site authorized representatives. (If 45-day is continuing from concurrent Draft) 3. No letter will be sent to the company.
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Create New Document for Final

Secretary	1. Under the Permit Record, make a copy of the Proposed ROP. a. Save as “{SRN}_REO ROP##### v#. #_XX-XX-20XX, Category “<i>ROP Documents</i>” 2. Under the Permit Record, make a copy of the Proposed Staff Report. a. Save as {SRN}_REO Staff Report_ ROP##### v#. #_XX-XX-20XX, Category “<i>ROP Documents</i>” 3. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>.
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E. Final ROP

If EPA did not raise objections during the 45-day review period, the ROP can be issued. If EPA objects to the issuance of the ROP during the 45-day review period, Region 5 will initiate the process established in 40 CFR 70.8(c).

Prepare the Final ROP

Secretary	1. Under the Permit Record, finalize the Final Reopening ROP. NOTE: if the was reopened to add an Acid Rain permit, you must make sure that the final updated Acid Rain permit has been incorporated into the ROP. 2. Delete “REO PROPOSED” from the header of the ROP. Do not change the effective date and expiration date. Issuance of the Reopening does not change the effective date and expiration date of the original ROP. 3. On the ROP certification page, insert the <i>date of approval</i> in the “Revision Date.” 4. Review document for any formatting issues. 5. Make sure to check tracked changes; accept all changes and stop tracking. 6. Make sure to check for any comments and delete all comments. 7. Update the Table of Contents by either right clicking on the Table of Contents and choosing “Update field”/“update entire table” or pressing F9 and choosing “update entire table.” 8. Save document as {SRN}_REO ROP##### v#.##_XX-XX-20XX (date finalizing ROP). 9. Put Supervisor signature on the ROP cover page. 10. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>.
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Prepare the Final Staff Report

Staff	If EPA provides comments during the 45-day review period, add a second addendum to explain those comments and changes made to the ROP. The date of the addendum is the ROP issuance date. If no comments are received from EPA, do not add an addendum.
Secretary	1. Finalize the Final Staff Report by doing a quick review to check formatting. 2. Make sure to check tracked changes; accept all changes and stop tracking. 3. Make sure to check for any comments and delete all comments.

	4. Update the Table of Contents by either right clicking on the Table of Contents and choosing “Update field”/“update entire table” or pressing F9 and choosing “update entire table.” a. Save document as {SRN}_ REO Staff Report _ROP##### v#. #_XX-XX-20XX (date finalizing ROP). 5. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>.
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Prepare the Letter to the company

Secretary	1. Under the Permit Record, generate the Letter to the company using <i>ROP – Letter - Initial & Renewal Approval</i>. a. Make sure the letter is addressed to the Responsible Official. b. If reopened to add an Acid Rain permit(s), make sure to add the Acid Rain paragraph in the letter. 2. Finalize the Letter by formatting and correcting any errors. a. Save document as <i>SRN_REO Letter with Final_ROP##### v#. #_XX-XX-20XX</i> (fill in date as date finalizing ROP). b. Have Supervisor review the letter, put Supervisor signature on the letter. 3. Make sure the Security Classification is <i>Internal</i> and the Status is <i>Draft</i>. 4. Mark the “Finalize ROP Documents...” workflow task as <i>Complete</i>. This will prompt the RCU DA to follow the next steps below.
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Send Documents to Company

RCU DA	1. Review all Final ROP documents and set the Security Classification to <i>Public</i> and the Status to <i>Final</i>. 2. Add information and hyperlinks to the Title V Renewable Operating Permit (ROP) Public Notice Documents Web Page.
RCU DA for RCU / Secretary for District	3. Generate the Email Body using <i>Email Body – Final ROP Letter</i>. (You can delete this after sending to company). a. Add your signature block to the bottom of the template and save.

	- Email the documents for the ROP, Staff Report, Letter and Entry for Inspection Brochure to the company. - Make sure to copy the Permit Writer(s), Compliance Manager, and appropriate Supervisors as well as any site authorized representatives.
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Finalize ROP and Complete Submission Records

Staff	- Finalize Technical Review Notes. - Remove “Draft” from the document. - Make sure the Security Classification is <i>Internal</i> and the Status is <i>Final</i>. Verify that all correct reporting schedules are in the Permit record. This should have been confirmed with the Compliance Manager during technical review and documented in the Technical Review Notes. (If the schedules are not correct, please contact the RCU DA to have them corrected.) - Verify that all required workflow tasks have been marked <i>Complete</i>. - Assign the “Issue Permit, and Update Application/Permit status” workflow task to the RCU DA. Add a due date so it will be easier to find on their My Tasks page.
RCU DA/Staff	If reporting schedules appear to not have been reviewed and corrected, the RCU DA will contact the Staff person to fix and make sure all the correct schedules are associated with the ROP.
RCU DA	- Verify no ROP reporting schedules are in a draft status on the company’s dashboard. - Make sure that the recurring permit schedules have the dates filled in so they begin on the new ROP. - Make sure any PTIs that have been rolled into the ROP have been related and permit status is “Terminated (Rolled into ROP).” - Fill out all information in the permit record and change status to issued. - Change the Permit Status to “In Effect.” - Mark the “Issue Permit, and Update Application/Permit status” workflow task as <i>Complete</i>.

	14. Make sure all workflow steps have been marked as complete in the submission. 15. Check box next to Reopening main workflow and click the “Mark Workflow Complete” button. 16. Update Status of the submission record to “Completed” and any modification submission records completed.
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Appendix A - Affected States ROP Notification

Notifications are made to affected states/provinces/tribes for the adjacent counties listed below:

State	Contact Name	Contact Email or Phone	Counties	Districts
Illinois	Azael Ramirez Sarah Brubaker	Azael.Ramirez@Illinois.gov Sarah.Brubaker@Illinois.gov	Allegan, Berrien, Van Buren	Kalamazoo
Indiana	Joanne-Smiddie Brush	JBRUSH@idem.in.gov	Berrien, Branch, Calhoun, Cass, Hillsdale, Jackson, Kalamazoo, Lenawee, St. Joseph, Van Buren	Jackson, Kalamazoo
Ohio	Andrea Moore	Andrea.Moore@epa.ohio.gov	Branch, Calhoun, Hillsdale, Jackson, Kalamazoo, Lenawee, Macomb, Monroe, Oakland, St. Joseph, Washtenaw, Wayne	Detroit, Jackson, Kalamazoo, Warren
Wisconsin	Randall Matty Ron Binzley	Randall.Matty@wisconsin.gov Ronald.Binzley@wisconsin.gov	Allegan, Antrim, Baraga, Benzie, Charlevoix, Delta, Dickenson, Gogebic, Grand Traverse, Iron, Leelanau, Manistee, Marquette, Mason, Menominee, Muskegon, Oceana, Ontonagon, Ottawa, Schoolcraft	Cadillac, Gaylord, Grand Rapids, Kalamazoo, Marquette

Canadian Agency	Contact Name	Contact Email or Phone	Counties	Districts
Ontario MECP, Sault Ste. Marie Area Office/ Sudbury District Office		enviropemissions@ontario.ca	Alpena, Cheboygan, Chippewa, Luce, Mackinaw, Presque Isle	Gaylord, Marquette
Ontario MECP, Sarnia/ Windsor District Office	John Beals	John.Beals@ontario.ca	Lapeer, Lenawee, Macomb, Monroe, Oakland, Sanilac, St. Clair, Washtenaw, Wayne	Bay City, Detroit, Jackson, Lansing, Warren
Ontario MECP, Windsor Area Office	Teri Gilbert	Teri.Gilbert@ontario.ca	Lenawee, Macomb, Monroe, Oakland, Washtenaw, Wayne	Detroit, Jackson, Warren
Ontario MECP, Air Policy and Programs Branch) Ministry of Environment, Conservation and Parks (MECP)	Dan McDonald (Director) Priya Mathur	Dan.Mcdonald@ontario.ca Priya.Mathur@ontario.ca	Alpena, Cheboygan, Chippewa, Lapeer, Lenawee, Luce, Mackinaw, Macomb, Monroe, Oakland, Presque Isle, Sanilac, St. Clair, Washtenaw, Wayne	Bay City Detroit, Gaylord, Jackson, Lansing, Marquette, Warren
Environment Canada	Andria Sherstone	Andria.Sherstone@ec.gc.ca	Alpena, Cheboygan, Chippewa, Lapeer, Lenawee, Luce, Mackinaw, Macomb, Monroe, Oakland, Presque Isle, Sanilac, St. Clair, Washtenaw, Wayne	Bay City Detroit, Gaylord, Jackson, Lansing, Marquette, Warren

Tribal Community	Contact Name	Contact Email or Phone	Counties	Districts
Bad River Band of Lake Superior Chippewa	Nathan Kilger	airquality@badriver-nsn.gov	Gogebic, Ontonagon	Marquette
Bay Mills Indian Community	Jessica Wesolek	jwesolek@baymills.org	Chippewa, Luce, Mackinac	Marquette
Forest County Potawatomi Community	Natalene Cummings	Natalene.Cummings@fcpotawatomi-nsn.gov	Dickinson, Gogebic, Iron, Menominee	Marquette
Keweenaw Bay Indian Community	Kim Klopstein Evelyn Ravindran Teal Sackett	tckim@kbic-nsn.gov eravindran@kbic-nsn.gov tsackett@kbic-nsn.gov	Baraga, Dickinson, Gogebic, Houghton, Iron, Keweenaw, Marquette, Ontonagon	Marquette
Grand Portage Band of Chippewa	Vallen Cook	vallenc@grandportage.com	Houghton, Keweenaw	Marquette

Appendix B - Handling Comments Received During Public Comment Period

No comments: In cases where no comments are received during the public comment period, this should be noted in the Staff Report addendum.

Comments about issues that are not pertinent to the permit: If comments are received that are related to zoning, noise, etc., are outside the ROP regulatory authority, or are NIMBY-type comments that cannot/should not be addressed in the permit, the decision-maker for the permit is informed that these comments have been received. A note is made in the file (and may be written directly on the letter itself if the comment is received in writing) to indicate that the comment has been determined not to be relevant to the permit and that the decision-maker has been informed.

Comments on relevant but “non-substantive” issues: Comments received about typographical errors, sentence structure or clarity, etc., are usually resolved by making the correction or wording adjustment in the permit, then calling the commenter to let them know that the change has been made. (This is routinely done for these kinds of comments from EPA.) A note is made in the permit file to document that the phone conversation took place. If warranted, the change may also be noted in the Staff Report addendum. After the permit is issued, a copy of the Staff Report is sent to the commenter(s) if the address is known.

Calls or letters about relevant but minor technical details and oversights: The handling of these comments is not especially formal, but this category of comments requires judgment based on the circumstances. If the comment is received in a letter from a legislator, this may best be addressed by a letter of response. If the comment is received from a citizen who has been regularly in contact to discuss the permit issues with staff and the individual is satisfied by a call, the comment and the follow-up are noted in the file. If warranted, such comments should be documented in the Staff Report addendum. A copy of the Staff Report should be sent to the commenter(s) if the address is known.

When comments are received, a summary and response is documented in the Staff Report addendum. Make sure all comments are sufficiently addressed. In addition, **thorough detail** should be added in the technical review notes. The comments are consolidated to the maximum extent possible and as concisely as possible. A mailing should be sent to all commenters when the permit is sent to EPA for 45-day review and when issued. This mailing includes the Staff Report with a cover letter to “Interested Parties” from the decision-maker with information regarding the permit status and explaining that the permit has been approved with appropriate changes based on comments received.