

Michigan Department of Environmental Quality
Air Quality Division

State Registration Number
{SRN}

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number
MI-ROP-**{SRN}**-
{YEAR}

{Company Name}

SRN: {SRN}

Located at

{ADDRESS}, Michigan

Permit Number: MI-ROP-**{SRN}**-**{YEAR}**

Staff Report Date: {DATE}
{Spell out the date; e.g. January 1, 2011}

{Amended Date: {DATE} } Delete if not a revision

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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Michigan Department of Environmental Quality
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State Registration Number
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RENEWABLE OPERATING PERMIT

ROP Number
MI-ROP-{SRN}-
{YEAR}

{Delete the word DRAFT after company review and insert
the 30-day start date of the public comment period}
{DATE} **DRAFT STAFF REPORT**

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	
	, Michigan
Source Registration Number (SRN):	{SRN}
North American Industry Classification System (NAICS) Code:	
Number of Stationary Source Sections:	
Is Application for a Renewal or Initial Issuance?	Initial Issuance / Renewal
Application Number:	
Responsible Official:	,
AQD Contact:	,
Date Permit Application Received:	
Date Application Was Administratively Complete:	
Is Application Shield In Effect?	{Yes / No}
Date Public Comment Begins:	
Deadline for Public Comment:	

Source Description

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System in the {YEAR} submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	
Lead (Pb)	
Nitrogen Oxides (NO _x)	
Particulate Matter (PM)	
Sulfur Dioxide (SO ₂)	
Volatile Organic Compounds (VOCs)	
Individual Hazardous Air Pollutants (HAPs) **	
Total Hazardous Air Pollutants (HAPs)	

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

See Parts C and D in the draft ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

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

The stationary source is located in _____ County, which is currently designated by the U.S. Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

{OR}

_____ County is currently designated by the U.S. Environmental Protection Agency (USEPA) as a non-attainment area with respect to the 8-hour ozone standard.

{AND/OR}

_____ County is currently designated by the U.S. Environmental Protection Agency (USEPA) as a non-attainment area with respect to the PM 2.5 standard.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR), Part 70, because {PICK ONE OR MORE OF THE FOLLOWING. COMBINE OR STREAMLINE SENTENCES WHERE APPROPRIATE TO AVOID REDUNDANT WORDING.}

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

AND/OR

the source is subject to {SPECIFY THE NSPS OR AREA SOURCE MACT THAT REQUIRES A 40 CFR, PART 70 PERMIT}.

{PICK ONE OF THE FOUR}

The stationary source is considered a “synthetic minor” source in regards to the Prevention of Significant Deterioration regulations of {PICK ONE OF THE FOLLOWING BASED ON UNDERLYING APPLICABLE REQUIREMENT AT TIME OF NSR PERMIT ISSUANCE: PART 18, PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY, OF ACT 451 OR 40 CFR, PART 52.21} because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of {carbon monoxide / each criteria pollutant / lead / nitrogen oxides / particulate matter / sulfur dioxide / volatile organic compounds} to less than {100 / 250} tons per year. (NOTE: USE 100 IF THE SOURCE IS ONE OF THE 28 CATEGORIES LISTED IN 40 CFR, PART 52.21)

{OR}

{LIST EMISSION UNIT ID(s)} at the stationary source (was/were) subject to review under the Prevention of Significant Deterioration regulations of {PICK ONE OF THE FOLLOWING BASED ON UNDERLYING APPLICABLE REQUIREMENT AT TIME OF NSR PERMIT ISSUANCE: PART 18, PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY, OF ACT 451 OR CFR 40, PART 52.21,} because at the time of New Source Review permitting the potential to emit of {carbon monoxide / each criteria pollutant / lead / nitrogen oxides / particulate matter / sulfur dioxide / volatile organic compounds} was greater than {100 / 250} tons per year. (NOTE: USE 100 IF THE SOURCES IS ONE OF THE 28 CATEGORIES LISTED IN 40 CFR, PART 52.21)

{OR}

No emissions units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451, because at the time of New Source Review permitting the potential to emit of {carbon monoxide / each criteria pollutant / lead / nitrogen oxides / particulate matter / sulfur dioxide / volatile organic compounds} was less than {100 / 250} tons per year. {NOTE: USE 100 IF THE SOURCE IS ONE OF THE 8 CATEGORIES LISTED IN 40 CFR, PART 52.21.}

{OR}

No emissions units at the stationary source are currently subject to the Prevention of Significant Deterioration (PSD) regulations of Part 18, Prevention of Significant Deterioration of Air Quality of Act 451 or 40 CFR, Part 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 IF APPLICABLE}

The stationary source has an emission unit(s) that (was/were) subject to {PICK ONE BASED ON THE UNDERLYING APPLICABLE REQUIREMENT AT THE TIME OF NSR PERMIT ISSUANCE: PART 19, NEW SOURCE REVIEW FOR MAJOR SOURCES IMPACTING NONATTAINMENT AREAS OF ACT 451 OR ACT 451, PART 55, RULE 220} for Major Sources Impacting Nonattainment Areas at the time of New Source Review permitting.

{LIST EU IDs} (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. However, future modifications of this equipment may be subject to NSR.

{OR}

Although {LIST EU IDs} (was/were) installed after August 15, 1967, this equipment was exempt from New Source Review (NSR) permitting requirements at the time it was installed. However, future modifications of this equipment may be subject to NSR.

{ADD OTHERS SUCH AS BACT, PART 6 RULES, TOXICS REVIEW UNDER RULES 224/225, STREAMLINING, ETC. AS APPROPRIATE. ALSO, DISCUSS ANY SIGNIFICANT CHANGES FROM THE PREVIOUS ROP. INCLUDE ANY OF THE FOLLOWING IF APPLICABLE}

{LIST EU IDs} at the stationary source is/are subject to the New Source Performance Standards for promulgated in 40 CFR, Part 60, Subparts A and .

{LIST EU IDs} at the stationary source is/are subject to the Maximum Achievable Control Technology Standards for promulgated in 40 CFR, Part 63, Subparts A and .

{LIST EU IDs} at the stationary source is/are subject to the National Emission Standard for Hazardous Air Pollutants for promulgated in 40 CFR, Part 61, Subparts A and .

{LIST EU IDs} at the stationary source is/are subject to the federal Acid Rain program promulgated in 40 CFR of, Part 72.

{SELECT ALL OF THE FOLLOWING THAT APPLY TO CAIR-SUBJECT SOURCES}

{LIST EU IDs} at the stationary source is/are subject to the Clean Air Interstate Rule NO_x annual trading program pursuant to Rules 802a, 803, 821, and 830 through 834.

{LIST EU IDs} at the stationary source is/are subject to the Clean Air Interstate Rule NO_x ozone season trading program pursuant to Rules 802a, 803 and 821 through 826.

{LIST EU IDs} at the stationary source is/are subject to the Clean Air Interstate Rule SO₂ annual trading program pursuant to Rule 420.

{ALWAYS INCLUDE}

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."

{IF THE SOURCE HAS **NO** EMISSION UNITS SUBJECT TO CAM, ADD THE FOLLOWING PARAGRAPH}

No emission units are subject to the federal Compliance Assurance Monitoring rule under 40 CFR, Part 64, because all emission units at the stationary source 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.

{IF CAM APPLIES, USE THE FOLLOWING PARAGRAPH FOR EACH EMISSION UNIT SUBJECT TO CAM}

{LIST EU/FG ID} at the stationary source is subject to the federal Compliance Assurance Monitoring (CAM) rule under 40 CFR, Part 64. This emission unit has a control device and potential pre-control emissions of **{LIST POLLUTANT}** greater than the major source threshold level.

{IF THE SOURCE HAS EMISSION LIMITATIONS OR STANDARDS EXEMPT FROM CAM, PICK THE APPROPRIATE OPTION(S)}

{IF CAM EXEMPT DUE TO NSPS OR MACT} The emission limitation(s) or standard(s) for **{LIST POLLUTANT}** from **{LIST EU/FG IDs}** at the stationary source is/are exempt from the federal Compliance Assurance Monitoring (CAM) regulation under 40 CFR, Part 64, because **{LIST EMISSION LIMITATION(S) OR STANDARD(S)}** is/are addressed by **{IDENTIFY 40 CFR, PART 60, NSPS or 40 CFR, PART 63, MACT STANDARD}**. Therefore, **{LIST EU/FG ID}** is exempt from CAM requirements for **{LIST POLLUTANT}**.

{IF CAM EXEMPT DUE TO ACID RAIN} The emission limitation(s) or standard(s) for **{LIST POLLUTANT}** from **{LIST EU/FG ID}** at the stationary source is/are exempt from the federal Compliance Assurance Monitoring (CAM) regulation under 40 CFR, Part 64, because **{LIST EMISSION LIMITATION(S) OR STANDARD(S)}** meet(s) the CAM exemption for Acid Rain monitoring requirements. Therefore, **{LIST EU/FG ID}** is exempt from CAM requirements for **{LIST POLLUTANT}**.

{IF CAM EXEMPT DUE TO CONTINUOUS COMPLIANCE DETERMINATION METHOD} The emission limitation(s) or standard(s) for **{LIST POLLUTANT}** from **{LIST EU/FG ID}** at the stationary source is/are exempt from the federal Compliance Assurance Monitoring (CAM) regulation under 40 CFR, Part 64, because **{LIST EMISSION LIMITATION(S) OR STANDARD(S)}** meet(s) the CAM exemption for a continuous compliance determination method. Therefore, **{LIST EU/FG ID}** is exempt from CAM requirements for **{LIST POLLUTANT}**.

{IF CAM EXEMPT DUE TO BACKUP UTILITY POWER EMISSION UNIT} The emission limitation(s) or standard(s) for **{LIST POLLUTANT}** from **{LIST EU/FG ID}** at the stationary source is/are exempt from the federal Compliance Assurance Monitoring (CAM) regulation under 40 CFR, Part 64, because the emission limitation(s) or standard(s) meet(s) the CAM exemption for a backup utility power emission unit. Therefore, **{LIST EU/FG ID}** is exempt from CAM requirements for **{LIST POLLUTANT}**.

{IF CAM EXEMPT DUE TO PRESUMPTIVE MONITORING} The emission limitation(s) or standard(s) for **{LIST POLLUTANT}** from **{LIST EU/FG ID}** at the stationary source is/are not exempt from 40 CFR, Part 64, but presumptively acceptable monitoring conditions from **{IDENTIFY 40 CFR, PART 60, NSPS OR 40 CFR, PART 63, MACT STANDARD}** are included in this ROP.

{ALWAYS INCLUDE}

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. _____ are identified in Appendix 6 of the ROP.

PTI Number			

Streamlined/Subsumed Requirements

{PICK ONE}

The following table lists explanations of any streamlined/subsumed requirements included in the ROP pursuant to Rules 213(2) and 213(6). All subsumed requirements are enforceable under the streamlined requirement that subsumes them.

[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, taking into account different units of measurement, averaging times, etc. Alternatively, include all of the items listed in the table below in a non-table format. For an example of the table, see “Staff Guidance on Streamlined/Subsumed Requirements” in the ROP Manual, Tab 3.G.]

{OR}

This permit does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6). [REMOVE TABLE]

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/Requirement	Subsumed Limit/Requirement	Stringency Analysis

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

{OR}

This permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2). [REMOVE TABLE]

Compliance Status

{PICK ONE}

The AQD finds that the stationary source 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 of the draft ROP. 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 permit 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 is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by the DEQ

The AQD proposes to approve this permit. 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 U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is _____, District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.