



Michigan Department of Environmental Quality
Air Quality Division

RENEWABLE OPERATING PERMIT

RENEWAL APPLICATION INSTRUCTIONS

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INTRODUCTION

This guide has been designed to help you complete and submit an administratively complete Renewable Operating Permit (ROP) renewal application. The guide provides instructions for completing the three (3) components of the ROP renewal application, which includes the ROP Renewal Application Form, a mark-up copy of the ROP, and any necessary supplemental information. You will also find instructions for submitting your ROP application to the Michigan Department of Environmental Quality (DEQ), Air Quality Division (AQD).

BACKGROUND

The ROP Program was developed in response to changes that Congress made to the federal Clean Air Act in 1990. [Title V](#) of the Clean Air Act Amendments of 1990 requires each state to develop an ROP Program for all major sources of air contaminants. Federal rules provide guidance to the states on establishing Title V programs. At the state level, the requirements of the ROP Program are incorporated into Part 2 of Michigan's Air Pollution Control Rules and are administered by the AQD. The ROP Renewal Application Form was developed in accordance with the Michigan [Part 2 Rules](#) and Title 40, [Part 70](#) of the Code of Federal Regulations (CFR).

The ROP Program is intended to simplify and clarify a subject facility's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document. Thus, all of the Permits to Install (PTI) and any other applicable air pollution control requirements that apply to the facility will be incorporated into one permit. An ROP does not add any new requirements; however, many facilities may have to establish new monitoring or recordkeeping systems to demonstrate compliance with emission limits and material usage limits when none are provided by the existing regulations. Once a source receives its ROP, the burden of proof that the source is in compliance with the applicable requirements contained in its ROP is shifted from the regulatory agency to the source. Thus, it becomes the source's responsibility to determine whether a deviation has occurred and to report findings to both the AQD and the USEPA. Therefore, the facility must regularly track its compliance with state and federal air quality requirements identified in its ROP and certify reports describing its compliance to the two regulatory agencies as specified by the ROP.

The requirements for the ROP Program in Michigan are found in R 336.1210 to R 336.1218 ([Rules 210-218](#)) of the Michigan Air Pollution Control Rules. The Michigan Air Pollution Control Rules can be accessed at www.michigan.gov/air (click on "laws and rules" then "air pollution control rules").

WHO IS SUBJECT TO THE ROP PROGRAM?

[Rule 211](#) of the Michigan Air Pollution Control Rules outlines what sources are subject to the ROP Program. Essentially, all **major sources** of air pollution are subject to the ROP Program as well as some non-major sources identified in Rule 211. The Clean Air Act contains not one, but many definitions of major source. To put it simply, any facility in Michigan that has the potential to emit 10 tons per year of any one hazardous air pollutant (HAP), 25 tons per year of any combination of HAPs, or 100 tons per year of any other regulated air contaminant is considered a major source and is subject to the ROP Program. As of July 1, 2011, a source with the potential to emit both 100,000 tons per year or more of Carbon Dioxide equivalents (CO₂e) and 100 tons per year or more of greenhouse gases on a mass basis is subject to Title V.

It is important to remember that the ROP requirements are dependent upon a facility's **potential to emit**, not its actual emissions. Potential to emit is the maximum amount of pollutants that all of the

emission units at the facility or source are capable of emitting annually if they were operated at their maximum hourly rate for 8,760 hours per year.

ROP RENEWALS

Each ROP is issued for a fixed term of five years, then it must be renewed. According to Rule 210(7) of the Michigan Air Pollution Control Rules (see Appendix B), an administratively complete application for renewal of an ROP must be received by the AQD not more than **18 months**, but not less than **six months**, before the expiration date of the current ROP. This means that you have a 12-month window in which you may submit your ROP application (Figure 1). **DO NOT** wait until the deadline to submit your ROP renewal application. Take into consideration that your ROP application could be returned to you if it is not administratively complete. It is typically best to submit the renewal application 9 to 12 months before expiration. That way, there should be plenty of time to ensure that the application is administratively complete.

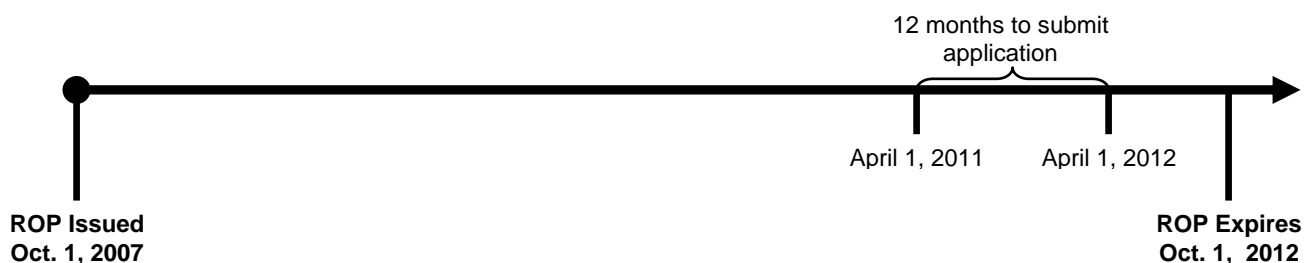


Figure 1: Example ROP Renewal Timeline

The ROP renewal application is designed to collect all of the information necessary for an administratively complete renewal application as required by [Section 5506 of Act 451](#).

The ROP renewal application package consists of three components:

1. The completed ROP Renewal Application Form
2. A mark-up copy of the existing ROP
3. Supplemental information (e.g., Permits to Install not yet incorporated into the ROP, required air emissions data not currently being reported using MAERS, Acid Rain Permit, etc.). The ROP Renewal Application Form will help you identify if any supplemental information should be submitted as part of your application package.

The ROP renewal application package must include all of the above listed items for it to be considered administratively complete and for the source to receive an "application shield". A hard copy version of the application package **MUST** be submitted to the appropriate AQD district office with an original signature. It is also highly recommended that you submit an electronic version of the application package. The date of receipt of the ROP renewal application package pursuant to Rule 210 is the day the hard copy of the application package is received at the appropriate AQD district office. The AQD will determine administrative completeness for an ROP renewal application through a screening process. If the ROP renewal application is submitted in paper form only, the AQD will make the administrative completeness determination within 60 days. If the application is also submitted electronically the AQD will make the administrative completeness determination within 15 days of receipt.

APPLICATION SHIELD

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

SECTIONED ROPs

An ROP application contains one section by default. It is not necessary to section the permit beyond this default. The sectioning option is provided to allow a source to further divide the ROP application by physical locations or different management organizations (i.e. owners) within the stationary source. Multiple sections may be created for a stationary source with multiple physical locations or multiple owners. Sections should not be created for separating emission units, flexible groups, or buildings within a stationary source. **If your ROP has more than one section you must complete the ROP Renewal Application Form for each section.**

GETTING STARTED

Where Do I Start?

Completing an ROP renewal application can be very confusing if you don't know where to start. Below are four steps you should take before beginning to work on your ROP renewal application.

Step 1: Contact your AQD District Office

Contact your AQD facility contact to discuss your plans to renew the ROP and setup a pre-application meeting. Appendix E contains contact information for all AQD District offices.

Step 2: Gather All the Necessary Materials

Before you begin your ROP Renewal Application Form, gather all the information you need. Some of the items that may be required include:

- The ROP Renewal Application Form. The form can be accessed at www.deq.state.mi.us/aps.
- An electronic version of your existing Renewable Operating Permit in Microsoft Word software. You can [download](http://www.deq.state.mi.us/aps) a Microsoft Word copy by going to www.deq.state.mi.us/aps.
- An electronic version of any Permits to Install that have been issued to the source and have NOT yet been incorporated in the ROP. These can be downloaded in Adobe Acrobat format (.pdf) at www.deq.state.mi.us/aps/FinalConditions.shtml. If you can not cut and paste from these files, then contact your AQD district office to obtain a Microsoft Word version.
- Consent Orders/Consent Judgments
- ROP Modification Applications not acted on by the AQD

- Most recent Michigan Air Emissions Reporting System ([MAERS](#)) submittal
- [MAERS Forms](#) (Emissions, Stack, etc.) as needed. The forms can be accessed at www.michigan.gov/air (click on “Emissions,” then “Emissions Reporting”).
- Greenhouse Gas Emissions information
- ROP Templates as needed. The templates can be accessed at www.deq.state.mi.us/aps.

Step 3: Review Your Existing ROP

You will be asked several questions about your existing ROP in the ROP Renewal Application Form. You will also need to mark up your existing ROP with any changes you indicate on the application form. Read through your existing ROP and compare the information contained in it to what is currently at your facility. Does everything match up? If you have installed or removed emission units and your existing ROP does not reflect these changes, you will need to make sure the information is entered correctly into your ROP renewal application.

Make a note of any equipment that is in your facility but not included in the ROP. If a Permit to Install was obtained for the equipment, have it available. You will need to enter information about this new PTI into the application form. Other equipment at your facility that does not appear in your existing ROP may or may not have to be included in the ROP application depending on what rule it is exempt under.

Also make a note of the equipment that is in your ROP but no longer in your facility, either because it was removed or rendered permanently inoperable. You will need to update this information in your application.

Step 4: Identify Any New Requirements

Is your source subject, or will it become subject, to any new state or federal regulations (e.g. a new Maximum Achievable Control Technology (MACT) standard)? If so, are the requirements in your existing ROP? If you are subject to new requirements and they have not yet been added to your ROP, you must include them in your ROP application. For example, if your source is subject to a MACT standard that was recently promulgated and that standard contains new applicable requirements, you will need to identify the regulation and corresponding requirements in your ROP application. Check the AQD website for templates and other guidance www.deq.state.mi.us/aps.

If your facility is subject to any new Permits to Install or Consent Orders/Judgments they will contain requirements which must be included in your ROP. If the requirements in the new permits or Consent Order/Judgment are not in your existing ROP, make a note of them. They will need to be identified in your application.

ROP PROGRAM RESOURCES

In addition to this workbook, there are several other resources you may wish to refer to for guidance in completing and submitting your ROP application. They include:

Online Tutorials

A tutorial that explains how to complete and submit an administratively complete ROP renewal application can be viewed at www.michigan.gov/deqworkshops (click on "Online Learning").

The Environmental Air Assistance Program

The Environmental Assistance Program can help with your ROP related questions and can be contacted by calling the Environmental Assistance Center at (800) 662-9278 or on the Internet at www.michigan.gov/air (select on "Clean Air Assistance").

DEQ, AQD Michigan Air Permit Web Site

The Michigan Air Permit web site provides information about the Permit to Install Program, ROP Program, MACT determinations, Acid Rain Permits, and other links of interest. At this web site you can view ROP Program support documents and application forms, a list of subject sources, public notice documents, as well as a list of draft, proposed, and issued ROPs. The Michigan Air Permit web site can be accessed at www.deq.state.mi.us/aps.

ROP RENEWAL APPLICATION FORM INSTRUCTIONS

The ROP Renewal Application Form has been designed to help you complete an administratively complete ROP renewal application . The form can be accessed at www.deq.state.mi.us/aps/downloads/rop/ROPforms/rop_forms.shtml . In addition to the application form you will also need to submit a mark-up copy of your existing ROP and any other supplemental information that is identified as being necessary in the form. Applicants should contact their AQD district office for assistance when needed.

Overview

The form is divided into 8 parts.

- Part A: General Information
- Part B: Submittal and Certification
- Part C: Source Requirement Information
- Part D: Exempt Emission Unit Information
- Part E: Existing ROP Information
- Part F: Permit to Install Information
- Part G: Emission Units Meeting the Criteria of Rule 281(h), 285(r)(iv), 287(c), or 290
- Part H: Requirements for Addition or Change

Each of these parts collects information necessary for your application to be administratively complete. A majority of the questions need a “Yes” or “No” response. Be sure to answer all questions unless specifically directed to do otherwise.

Remember that if the ROP has more than one section, a separate ROP Renewal Application Form **MUST** be completed for each section. In the upper right corner of the application form there is a field to identify the corresponding section number (Figure 2). Be sure to complete this box. You do not have to enter a section number if your permit is not sectioned.

SRN: Z9999	Section Number (if applicable):
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Figure 2: SRN and Section Number Field

Additional Information Form

An Additional Information Form (AI-001) may be used to supplement any of the information required on the application form. A box appears at the end of most parts of the application form indicating that an AI-001 Form has been attached. Instructions for completing the AI-001 Form can be found on page 27.

If you complete AI-001 Forms it is recommended that you complete a separate one for each part of the application. For example, if you are supplementing information needed in Parts E and H, you complete one AI-001 Form for Part E and one AI-001 Form for Part H.

PART A: GENERAL INFORMATION

This part of the application form collects basic information about the facility including location and owner information as well as information about the contact and responsible official.

Source Information

1. **SRN:** Enter the source's state registration number (SRN).
2. **SIC Code:** Enter the Standard Industrial Classification (SIC) code that best describes the major product produced or service provided by your source. SIC code information can be found at www.osha.gov/pls/imis/sicsearch.html.
3. **NAICS Code:** Enter the North American Industrial Classification System (NAICS) Code that best describes the major product produced or service provided by your source. This code must be a five digit numeric code. NAICS code information can be found on the internet www.census.gov/eos/www/naics. This code can also be found in your previous ROP applications and MAERS Reports.
4. **Existing ROP Number:** Enter the Renewable Operating Permit number that appears on your existing permit (e.g. MI-ROP-Z9999-2007).
5. **Section Number:** If the ROP is sectioned, enter the appropriate section number. Note that a separate ROP Renewal Application Form should be completed for each section of a sectioned ROP and must be signed and certified by the appropriate Responsible Official(s).
6. **Source Name:** Enter the specific name that identifies the stationary source.
7. **Street Address, City, State, Zip Code, and County:** Enter the physical address of the stationary source location. DO NOT use a post office box number.
8. **Section/Town/Range:** Only complete this field if a street address is not available.
9. **Source Description:** Enter a brief description of the source's processes and products.

Owner Information

10. **Owner Name:** Enter the name of the owner or parent/holding company (e.g., Big Widget Corp., Middletown Board of Education, Joe Clean).
11. **Mailing Address:** If the owner's address is identical to the source address, check the box as indicated in this field. If the owner address is different than the source address, complete these fields. Fill out the name and address exactly the way it should appear on all correspondence.

Contact Information

The contact is the person the AQD will contact if they have questions about the ROP renewal application. The form provides room to enter up to two contacts for the facility.

- 12. Contact Identification:** Information about the source contact should be entered in these fields. The contact must be properly authorized pursuant to Rule 204 (see Appendix B).

Enter the name, mailing address, telephone number, fax number, and e-mail address for each contact. If the contact address is the same as the source or owner address, check the box where indicated in the field.

Responsible Official Information

The Responsible Official is the person that certifies the information in the ROP application package as truthful and accurate. Only certain individuals may be considered a "Responsible Official." Rule 118(j) provides the Responsible Official criteria (see Appendix B). The form provides room to enter up to two responsible officials for the facility.

- 13. Responsible Official Identification:** Information about the source's Responsible Official should be entered in these fields. A responsible official must meet the criteria specified in Rule 118(j).

Enter the name, mailing address, telephone number, fax number, and e-mail address for the Responsible Official.

Part B: APPLICATION SUBMITTAL AND CERTIFICATION BY RESPONSIBLE OFFICIAL

This part of the application form is used to identify the items that are included as part of your administratively complete application and to certify the application. You may want to wait until you have completed the rest of the application form before completing this Part.

Listing of ROP Application Contents

Listing of ROP Application Contents			
<input type="checkbox"/>	Completed ROP Application Forms (required)	<input type="checkbox"/>	Compliance Plan/Schedule of Compliance
<input type="checkbox"/>	Mark-up copy of existing ROP (required)	<input type="checkbox"/>	Compliance Assurance Monitoring (CAM) Plan
<input type="checkbox"/>	Copies of all Permit(s) to Install that have not been incorporated into ROP (required)	<input type="checkbox"/>	Acid Rain Permit Initial/Renewal Application
<input type="checkbox"/>	Additional Information (AI-001) Forms	<input type="checkbox"/>	Clean Air Interstate Rule (CAIR) Permit Initial/Renewal Application(s)
<input type="checkbox"/>	MAERS Forms (to report emissions not previously submitted)	<input type="checkbox"/>	Confidential Information
<input type="checkbox"/>	Greenhouse Gas Emissions information (if applicable)	<input type="checkbox"/>	Copies of all Consent Order/Consent Judgments that have not been incorporated into existing ROP
<input type="checkbox"/>	Stack information	<input type="checkbox"/>	Other, explain:
<input type="checkbox"/>	Paper copy of all documentation provided (required)	<input type="checkbox"/>	Electronic documents provided

Use this table to identify the necessary items that are being submitted as part of your ROP application. For your application to be complete, it must include all of the following: a mark-up of the existing ROP, all Permits to Install that have not already been incorporated into the existing ROP, and all supplemental documentation required as a part of the application package. Other items that must be included but are only applicable to some sources are also listed in this table.

Per [Section 5507\(f\)](#) of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994, P.A. 451 as amended (Act 451), an administratively complete ROP application must contain, at least, the following information necessary to evaluate the source and to determine all applicable requirements.

- Citation and description of all applicable requirements
- Identification of applicable test methods for determining compliance with applicable requirements and any other information necessary to implement and enforce applicable requirements or determine applicability
- Emissions calculations necessary to demonstrate compliance with all applicable emission limitations and standards
- Information on fuels, fuel use, raw materials, production rates, and operating schedules, to the extent it is needed to determine or regulate emissions
- Identification of all emission limits or work practice standards
- Descriptions of air pollution control equipment and compliance monitoring devices
- Identification of stack height limitations
- Information necessary to define alternative operating scenarios

If, for any reason, the application package does not contain the information in the bulleted items above, then an AI-001 Form needs to be completed identifying the deficient information.

Compliance Statement

Answer each of the compliance statements as they pertain to all the applicable requirements to which the source is subject. If any of the statements are checked "No", identify the emission unit(s) or flexible group(s) affected and the specific condition number(s) or applicable requirement for which the source expects to be out of compliance on an AI-001 Form. Provide a compliance plan and schedule of compliance, as defined in Rule 103(dd) and Rule 119(a) (see below) on an AI-001 Form.

Note that the method or methods used to determine compliance for each applicable requirement must be the method(s) specified in the existing ROP, Permits to Install that have not yet been incorporated into that ROP, and all other applicable requirements not currently contained in the existing ROP.

- A "compliance plan" means a description of the compliance status of a source with respect to all applicable requirements for each process or process equipment as follows:
 - (i). For applicable requirements with which the source is in compliance, a statement that the source will continue to comply with the requirements.
 - (ii). For applicable requirements that will become effective during the permit term, a statement that the source will meet the requirements on a timely basis.
 - (iii). For applicable requirements for which the stationary source is not in compliance at the time of permit issuance, a narrative description of how the stationary source will achieve compliance with the requirements.

- A "schedule of compliance" means, for purposes of Rule 201 to Rule 218, all of the following:
 - (i). For a source not in compliance with all applicable requirements at the time of issuance of a renewable operating permit, a schedule of remedial measures, including an enforceable sequence of actions or operations that specifies milestones, leading to compliance with an applicable requirement, and a schedule for submission of certified progress reports, at least every 6 months. The schedule shall resemble, and be at least as stringent as, a schedule contained in a judicial consent decree or administrative order to which the source is subject. A schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirement on which it is based.
 - (ii). For a source in compliance with all applicable requirements at the time of issuance of a renewable operating permit, a statement that the source will continue to comply with the requirements.
 - (iii). With respect to any applicable requirement that has a future effective compliance date that is after the date of issuance and before the date of expiration of the renewable operating permit, the schedule of compliance shall contain a statement that the source will meet the requirement on a timely basis, unless the underlying applicable requirement requires a more detailed schedule.

Signature

The source's Responsible Official must sign and date this form. The hard copy of the ROP application form sent to the AQD must have an original signature.

PART C: SOURCE REQUIREMENT INFORMATION

The questions in Part C pertain to specific requirements or programs to which the source may be subject.

- C1. [Section 5507\(1\)\(f\)\(iii\)](#) of Public Act 451 of 1994, as amended (Act 451) requires actual emission rates in tons per year to be submitted as part of an administratively complete application. Therefore material throughput and emissions data must be reported for each emission unit with process specific emission limits or standards. This includes emission units identified in the existing ROP, new Permits to Install and other equipment that have not yet been incorporated into the ROP. The permittee may use the previous year's MAERS submittal to fulfill this requirement. Select "Yes" if there are emission units with applicable requirements that were NOT reported in MAERS during the last reporting year. If "Yes", is selected you will need to identify the emission units that were not reported in MAERS in the comment field provided or on an AI-001 Form. Emission data must be provided on hard copy MAERS forms as an attachment.

The [MAERS forms](#) can be accessed on the Internet at www.michigan.gov/air (select "Emissions," "Emissions Reporting," then "MAERS Support Resources").

- C2. Select "Yes" if this source has any air conditioners or refrigeration equipment that is subject to [40 CFR, Part 82](#), Subpart A through G. Otherwise select "No". Any applicable requirements under the federal program regulating ozone-depleting substances (40 CFR, Part 82) need not be listed unless the facility is in violation of that specific condition or requirement.

You may be subject to one or more requirements specified in 40 CFR, Part 82.1-184 (based on the 1990 Clean Air Act, [Title VI](#) and amendments) if the company you operate:

1. Manufactures CFCs, HCFCs, and/or chlorinated types of compounds or equipment that use these chemicals or their alternatives.
 2. Owns, operates, services, repairs and/or recycles air conditioning equipment, home appliances, industrial refrigeration systems, and/or other related industrial refrigerant processes ([Section 608 Refrigerant Recycling Rule](#).)
 3. Services, repairs, and/or recycles motor vehicle air conditioning systems ([Section 609 Motor Vehicle Air Conditioning](#)).
 4. Is a microchip manufacturer (use of a specific cleaner) or a foam manufacturer (use of a gas to blow the foam) ([Section 610 Nonessential Product Bans](#)).
 5. Uses alternatives or CFC or HCFC solvents for cleaning. ([Section 612 Significant New Alternatives Policy Program](#))
- C3. Select "Yes" if this source is subject to the Federal Accidental Release Program requirements pursuant to Clean Air Act Section 112(r). Refer to [40 CFR, Part 68](#). If "Yes" is selected, check the box to indicate whether a Risk Management Plan (RMP) has been submitted to the USEPA. Any applicable requirements under the federal accidental release program (40 CFR, Part 68) need not be listed unless the facility is in violation of that specific condition or requirement.

Who is Subject to the Federal Accident Release Program?

Companies of all sizes that use certain listed chemicals must submit plans that detail how they will prevent accidental chemical releases from occurring. This compliance requirement is known as the Accidental Release/Risk Management Program of the 1990 Clean Air Act Amendment's Section 112(r). The goal of this regulation is to communicate potential risks to the public and ensure that facilities have implemented a baseline internal management structure that includes safety and prevention and emergency response programs to reduce the possibility of an accidental release. The primary tool used to accomplish this goal is the Risk Management Plan (RMP). A facility must develop a RMP if they have regulated substances (comprised of toxic chemicals and flammables) identified under Section 112(r) at or above a specific threshold quantity that is set for each substance. The size of the company does not determine applicability; a business is required to complete a RMP if the type and quantity of chemicals used are listed as regulated substances under the rule. For more information about the Risk Management Program go to www.epa.gov/emergencies/content/rmp/index.htm.

- C4. In order to determine whether your source is a major source for Greenhouse Gas (GHG) pollutants, calculate the potential to emit of GHG in accordance with Appendix C.

Select "Yes" if this stationary source has the potential to emit equal to or greater than:

- 100,000 tons per year of CO₂e

AND

- 100 tons per year of greenhouse gases on a mass basis.



Both criteria must be met to answer "Yes".

If "Yes", you will need to provide greenhouse gas emissions information on an AI-001 Form. This should consist of a listing of emission units that emit greenhouse gases and the associated GHG emission calculations.

Note: As of January 2, 2011, a source must include information regarding any applicable Greenhouse Gas requirements in the ROP application. If the source underwent a Prevention of Significant Deterioration (PSD) review that established applicable Best Available Control Technology (BACT) requirements for GHGs, the source must incorporate these GHG applicable requirements into their ROP. These applicable requirements are typically contained in conditions of a Permit to Install and would therefore be identified in Part F of this application, if they have not already been incorporated into the existing ROP. Otherwise, any other GHG applicable requirements should be identified in Part H of the application.

Note: The Federal Mandatory GHG Reporting Rule for sources established under 40 CFR, Part 98 is currently not defined as an "applicable requirement" under Title V and therefore does not have to be identified as such in Part H. More information about the USEPA Greenhouse Gas Reporting Program can be found at www.epa.gov/climatechange/emissions/ghgrulemaking.html.

- C5. Select "Yes" if any emission units at the stationary source are subject to the Clean Air Interstate Rule (CAIR). Identify the specific emission unit(s) subject to CAIR in the comments field or on an AI-001 Form.

If "Yes", you will need to submit the CAIR Permit Application with your ROP renewal application. If you are including these application forms, check the box in C5 to indicate that the appropriate

forms have been included with this application. Information about CAIR can be found at: www.deq.state.mi.us/aps/downloads/CAIR/CAIR_overview.shtml (click on "CAIR Materials").

- C6. Select "Yes" if any emission units at the stationary source are subject to the federal Acid Rain Program. Identify the specific emission unit(s) subject to the Federal Acid Rain Program in the comments field or on an AI-001 Form.

If "Yes", you will need to submit the Acid Rain Permit renewal application with your ROP renewal application package. If you are including these application forms, check the box in C6 to indicate that the appropriate forms have been included with this application. Acid Rain application forms are available from the AQD upon request or at the EPA Acid Rain web site www.epa.gov/airmarkets/arp/index.html. Additional information about the Acid Rain Program can be found at www.deq.state.mi.us/aps/downloads/acidrain/acidrain.shtml.

- C7. Select "Yes" if the stationary source has any monitoring plans including malfunction abatement plans, fugitive dust plans, operation/maintenance plans, or any other monitoring plans that are required in an existing ROP, Permit to Install requirement, or any other applicable requirement.

If "Yes", you will need to include the document as part of the ROP renewal application package. Check the "Other" box on Part B and list the plan that is attached.

Essentially any plan that is referenced in an ROP, Permit to Install requirement, or other applicable requirement that is used to demonstrate compliance must be submitted as part of the application.

This is also true for startup, shutdown, malfunction plans required under MACT standards unless specified differently within the standard.

PART D: EXEMPT EMISSION UNIT INFORMATION

Use the table provided in this part to identify all emission units exempt under R 336.1212(4) (Rule 212(4)) of the Michigan Air Pollution Control Rules (see Appendix B). These are emission units that do not appear in the existing ROP and are required to be listed in the ROP application. You may group identical emission units (e.g., space heaters under Rule 282(b)).

If an emission unit is otherwise exempt under Rule 212 but has applicable requirements, it must be captured in the ROP Renewal Application Form on either Parts G or H. For example, emission units exempt from Permit to install under Rule 287(c) should not be listed here since they have applicable requirements that need to be captured in the ROP. If the source already has a(n) emission unit/flexible group table in the existing ROP, this emission unit/flexible group will be captured under Part E of the application, otherwise it should be entered onto part G. If needed, list additional exempt emission units on an AI-001 Form.

D1. Select “Yes”, if the source has any emission units that do not appear in the existing ROP and are required to be listed in the application under Rule 212(4) of the Michigan Air Pollution Control Rules. Identify the emission units that are exempt under Rule 212(4) in the table as shown below.

Select “No” if there are no emission units that are exempt under Rule 212 and go to Part E.

Emission Unit ID	Emission Unit Description	Rule 201 Exemption [e.g. Rule 282(b)(i)]	Rule 212(4) Exemption [e.g. Rule 212(4)(b)]
EU-SPACEHTRS	5 natural gas fired space heaters. All heaters less than 100,000 btu/hr.	Rule 282(b)(i)	Rule 212(4)(b)
EU-LPGTANKS	2 LPG Storage Tanks. Each with storage capacity of 6,000 gal	284(b)	Rule 212(4)(c)

PART E: EXISTING ROP INFORMATION

Review all emission units and applicable requirements (including any source wide requirements) in the existing ROP. Answer the questions as they pertain to **all** emission units and **all** applicable requirements in the existing ROP.

E1. Select “Yes”, if you are proposing to make any changes, additions, or deletions to the existing ROP. Examples include making administrative changes to the text within the permit, incorporating the conditions from a Permit to Install (PTI) or incorporating the requirements from a regulation (e.g. a MACT standard). In most cases you will have obtained a PTI to add or change conditions. The PTI will need to be identified in Part F of this application. Other additions or changes that do not involve a PTI will have to be identified in Parts G or H of the application.

If you choose “Yes”, use Parts F, G, or H to describe the proposed changes or additions. Changes will need to be identified in the mark-up copy or your existing ROP.

Select “No,” if you want to keep ALL the conditions in your existing ROP without any changes.

Note: A copy of the existing ROP is required to be included in the application package regardless of whether “Yes” or “No” is answered in this question.

E2. Review the stack/vent requirements associated with each emission unit in your existing ROP (Figure 3). Stacks with applicable requirements in the existing ROP must be identified in the ROP renewal application. To meet this requirement companies can refer to stack information that was previously reported in MAERS. If any stacks with applicable requirements were NOT reported in the source’s previous MAERS report, then select “Yes”. Identify the stacks that were not in MAERS on the MAERS [Stack Form](#) (SV-101), which can be accessed at www.michigan.gov/air (click on “Emissions”, “Emissions Reporting”, then “MAERS Support Resources”).

VIII. STACK/VENT RESTRICTION(S)			
The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:			
Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBoiler1	30 ²	28 ²	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)
2. SVBoiler2	24 ²	44 ²	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)
3. SVBoiler3	24 ²	46 ²	R 336.1225, R 336.1901, 40 CFR 52.21(c) & (d)

Figure 3: Stack/Vent Restriction(s)

E3. Stationary sources that are required to obtain an ROP may also be required to submit a Compliance Assurance Monitoring (CAM) Plan with their renewal application if emission units at the source are subject to CAM. If necessary, review the guidance on CAM provided in Appendix D. Select “Yes” if any emission units identified in the existing ROP are subject to CAM.

If you select “Yes”, identify the specific emission unit(s) subject to CAM in the comments field or on an AI-001 Form. If a CAM plan has not been previously submitted to the AQD for an emission unit, one must be included with the ROP renewal application on an AI-001 Form. If a CAM plan was previously submitted and has been incorporated into the existing ROP, reference the submittal date on the AI-001 Form. If a CAM plan is included with this application, check the box as indicated in question E3.

- E4. Fugitive emissions may be regulated through federal regulation, state rule, or permit condition (e.g., Fugitive dust plans, Synthetic Organic Chemical Manufacturing Industry (SOCMI) leak detection program, or fugitive monitoring plan). If fugitive emissions are regulated at your source, there will be applicable requirements that pertain specifically to fugitive emissions in your ROP (see Figure 4). Select “Yes” if any emission units identified in the existing ROP emit regulated fugitive emissions. If “Yes”, identify the specific emission unit(s) that have regulated fugitive emissions in the comments field or on an AI-001 Form.

<p>1. The permittee shall not operate EUSTORAGE unless the program for continuous fugitive emissions control for all plant roadways, the plant yard, all material storage piles, and all material handling operations specified in Appendix 10 has been implemented and is maintained.² (R 336.1371, R 336.1372)</p>
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Figure 4: Fugitive Emission Applicable Requirement

- E5. Select “Yes” if any emission units have been modified or reconstructed as defined in Rules 113(e) or 118(b), respectively (see Appendix B). If “Yes” is selected, identify the emission unit(s), the date that the modification or reconstruction occurred, and the PTI No. obtained (if applicable) in Part F.
- E6. Review the emission units identified in your existing ROP and the emission units that are actually at the stationary source. If an emission unit has been dismantled or rendered permanently inoperable, select “Yes”. Identify the emission unit(s) and the dismantle date in the comments area or on an AI-001 Form.

PART F: PERMIT TO INSTALL INFORMATION

Part F is used to identify applicable requirements from a Permit to Install (PTI) that have not been incorporated into the existing ROP.

- F1. Select “Yes” if the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP.

If “Yes” is selected you must enter the information about the PTI in the table provided (Figure 5). Enter the PTI number, the Emission Unit/Flexible Group ID(s) (e.g., EU-COAT, FG-BOILERS), a description of the process(es) and control device(s), and the date of equipment installation, modification, or reconstruction. An administratively complete application must include a copy of any PTIs that were issued and identified in this table. Incorporate all PTI conditions in the mark-up of the ROP.

Answer questions F2 to F6 in this part as they pertain to all the emission units and all the applicable requirements associated with the PTI(s) referenced in the table.

F1. Has the source obtained any PTIs where the applicable requirements from the PTI have not been incorporated into the existing ROP? If Yes, complete the following table. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, go to Part G.			
Permit to Install Number	Emission Units/Flexible Group ID(s)	Description (Include Process Equipment and Control Devices)	Date of Installation/Modification/Reconstruction
999-09	EU-PAINT1	paint booth with fabric filter and nat gas fired oven	8-1-09

Figure 5: Permit to Install identified in Part F

- F2. A PTI may be issued to install/construct a new source of emissions at a stationary source or to modify an existing emission unit at the source (e.g., change existing process restriction, monitoring, etc). Select “Yes” if the PTI changes, adds, or deletes terms and conditions to the established emission units or flexible groups in the existing ROP. If a PTI was issued and it does not affect any emission units in the existing ROP, select “No.”

If “Yes” is selected, identify the emission unit(s) or flexible group(s) affected by the PTI in the comment area or on an AI-001 Form. Indicate the changes to the existing conditions where appropriate on the mark-up of the existing ROP.

If “No” is selected, then all terms and conditions in the emission unit or flexible group tables in the PTI will be incorporated into the ROP, exactly as they appear in the PTI.

- F3. Review the stack/vent requirements associated with each emission unit in the PTI(s) listed in the table. Stacks with applicable requirements (e.g., stack height, diameter restrictions) must be identified in the ROP renewal application package. If any stacks with applicable requirements were NOT reported in the source’s previous MAERS report, then select “Yes”. Identify the stacks that were not in MAERS on the MAERS [Stack Form](#) (SV-101), which can be accessed at www.michigan.gov/air (click on “Emissions”, “Emissions Reporting”, then “MAERS Support Resources”).

- F4. Stationary sources that are required to obtain an ROP may also be required to submit a Compliance Assurance Monitoring (CAM) Plan with their renewal application if emission units at the source are subject to CAM. If necessary, review the guidance on CAM provided in Appendix D. Select "Yes" if any emission units in the PTI(s) identified in the table are subject to CAM.

If you select "Yes", identify the specific emission unit(s) subject to CAM in the comments field or on an AI-001 Form. A CAM plan must be included with the ROP renewal application on an AI-001 Form. If a CAM plan was previously submitted to the AQD and incorporated into the ROP, reference the submittal date on the AI-001 Form. If a CAM plan is included with this application check the box as indicated in Part B.

- F5. Fugitive emissions may be regulated through federal regulation, state rule, or permit condition (e.g., Fugitive dust plans, Synthetic Organic Chemical Manufacturing Industry (SOCMI) leak detection program, or fugitive monitoring plan). If fugitive emissions are regulated at your source, there will be applicable requirements that pertain specifically to fugitive emissions in the PTI. Select "Yes" if any emission units in the PTI(s) referenced in the table emit regulated fugitive emissions. If "Yes", identify the specific emission unit(s) that have regulated fugitive emissions in the comments field or on an AI-001 Form.

- F6. Some sources may want to make administrative changes to emission unit names and descriptions contained in the PTI since it was issued. Select "Yes" if you want to propose to change the name of an emission unit, the description of an emission unit, or the control devices in the PTI(s) referenced in the table. For example, if a coating operation is identified as EU-COAT1 in the issued PTI, the source can propose to change the name to EU-TOPCOAT before it is incorporated into the ROP. If you select "Yes", describe the proposed changes on an AI-001 Form.

PART G: EMISSION UNITS MEETING THE CRITERIA OF RULE 281(h), 285(r)(iv), 287(c), OR 290

The purpose of this part of the application form is to identify new and existing emission units which do not already appear in the existing ROP and which meet the criteria of Rule 281(h), 285(r)(iv), 287(c), or 290 of the Michigan Air Pollution Control Rules. These rules exempt specific sources of air emissions from obtaining a Permit to Install but must be included in the ROP because they have specific applicable requirements associated with them. If a source has an emission unit that falls under one of these Permit to Install exemptions there may be a table in the ROP that specifically addresses these units (Figure 6). If not, a table will be added by AQD staff to incorporate these rule requirements.

- **Rule 281(h) or Rule 285(r)(iv)** exempts certain cleaning operations that is exempt from the requirement to obtain a Permit to Install.
- **Rule 287(c)** exempts certain coating lines from the requirement to obtain a Permit to Install.
- **Rule 290** exempts emission units with limited emissions from the requirement to obtain a Permit to Install.

FG-COLDCLEANERS FLEXIBLE GROUP CONDITIONS	
DESCRIPTION	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.
Emission Unit: EU-COLDCLNRS	
I. EMISSION LIMIT(S)	
NA	

Figure 6: Flexible Group Table in ROP for Rule 281(h) exempt cold cleaners

G1. Select "Yes" if the source has any new and/or existing emission units which do not already appear in the existing ROP and which meet the criteria of Rules 281(h), 285(r)(iv), 287(c), or 290 and complete the table provided.

If you have installed or removed an emission unit that meets the criteria of one of these rules and your existing ROP already includes a requirement table that pertains to the rule (Figure 6) you should identify how many of the units were added or removed in the space provided. If there is not a requirement table in the existing ROP that pertains to the rule and you installed an emission unit that was exempt under one of these rules, you must identify the emission unit in the table provided. Enter an emission unit ID, process/control device description and the date of installation. If several emission units were installed under the same rule, provide a description and an installation date for each unit (see figure).

Note: If several emission units were installed under the same exemption, provide a description of each and an installation date for each.

Origin of Applicable Requirements	Emission Unit Description – Provide Emission Unit ID and process equipment/control device descriptions	Installation Date(s)
<input checked="" type="checkbox"/> Rule 281(h) or 285(r)(iv) cleaning operation	1 new degreasing unit (EU-COLDCLEANER) located next to EUTOPCOAT1	7/15/08
<input checked="" type="checkbox"/> Rule 287(c) surface coating line	Booth (EU-TOUCHUP) used for touch up of parts	8/1/09

PART H: REQUIREMENTS FOR ADDITION OR CHANGE

Overview

This part of the application form is used to propose changes, (including additions and/or deletions) to your existing ROP. It is expected that most existing applicable requirements will be kept as they were written in the original document from which they were created (i.e., existing ROP or Permit to Install). However, certain situations may exist in which an applicable requirement may need to be added, including adding new applicable requirements from state or federal regulations that the source is, or will be, subject to and must be incorporated into the ROP. This may include newly promulgated Maximum Achievable Control Technology (MACT) standards. It could also include other proposed changes to the existing ROP such as creating or modifying flexible groups in the existing ROP, making administrative revisions that do not require a Permit to Install (PTI), ROP modification applications not acted on by the AQD, and any other requirements not previously identified in other parts of the form.

Part H is designed to capture the information necessary for changing, adding or deleting applicable requirements. In this part the source will identify that a change needs to be made, the emission units or flexible group the change affects, the high level citation for any regulations that need to be incorporated, and the justification for the specific change. The applicant needs to identify the specific change, addition, or deletion on the mark-up of the existing ROP where appropriate

Do not include additions or changes that have already been identified in Parts F or G of the application form. For example, if you obtained a PTI to make changes and that PTI is referenced in Part F of the application, you do not need to include the requirements here. Also, if you installed an emission unit that met the criteria of Rules 287(c), 290, or 281(h) it should be included in Part G, not here.

Instructions

H1. Select "Yes" if there are any changes being proposed to what was found in the existing ROP or that have not already been identified in Parts F or G of this application. This may include the incorporation of requirements from a new regulation, minor text changes, or modifying language in a condition of the ROP.

If "Yes", continue to answer the questions in Part H. If "No", you do not have to complete the rest of this Part since no changes are being proposed.

H2. Some sources may want to make administrative changes to established emission unit names and descriptions contained in their existing ROP. Select "Yes" if you want to propose a change to the name of an emission unit, the description of an emission unit, or the control devices in your existing ROP. For example, a coating operation is currently called EU-COAT1 and you would like to change the name to EU-TOPCOAT. The process (emission unit) is the same and you just want to change the identifier used in the ROP. If you select "Yes", identify the proposed changes in the Emission Unit Summary Table in the mark-up of the existing ROP. Any changes to the process or control device should be specific.

H3. Select "Yes" if you are proposing to create a new emission unit(s) or flexible group(s) that have not already been identified in Parts F or G of the application. Add the emission unit/flexible group to the Emission Unit Summary Table in the mark-up of the existing ROP. The ID used to identify the emission unit or flexible group must begin with an "EU" or "FG" prefix plus any

combination of up to 14 letters, numbers, or keyboard characters. Spaces are not allowed within the operator's ID. Make the ID specific and easy to associate with the emission unit or flexible group it represents (e.g. EUPAINTBOOTH, FGBOILERS). If you already established an ID in MAERS, the same ID should be used in this application. A description of the process and control device must contain sufficient detail to clearly identify the equipment, control device(s) and material/fuel used.

- H4. Select "Yes" if you are adding, changing, or deleting terms, conditions or underlying requirements to the existing ROP. If "Yes", identify in the space provided the new or existing emission unit(s)/flexible group(s) that the proposed change, addition, or deletion affects. Include the emission unit/flexible group ID and the high level citation for each state or federal underlying applicable requirement that the emission unit/flexible group is subject to. For example, if you are proposing to add the requirements from a new standard enter the citation (e.g., 40 CFR 63, Subpart M) (Figure 7).

H4. Does the source propose to make any additions, changes or deletions to terms, conditions and underlying applicable requirements to the existing ROP?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, identify each emission unit/flexible group subject to the addition, change or deletion and identify the high level citation for <u>each</u> state or federal underlying applicable requirement that the emission unit/flexible group is subject to.	
FG-COATING is subject to 40 CFR 63, Subpart M	

Figure 7: Question H4 Example

- H5. Some sources are subject to consent orders or consent judgments (CO/CJ) that contain applicable requirements, which may not have been incorporated into the existing ROP. If an applicable requirement is included in a CO/CJ, the citation will be identified in parenthesis in the ROP immediately after the condition. Select "Yes" if the source was issued a CO/CJ and it has not been incorporated into the ROP and the applicable requirements will apply after the ROP is renewed.

Answer "Yes" to H5 only if the source is subject to a CO/CJ that contains requirements that are NOT cited in the existing ROP.

If "Yes", enter the CO/CJ number in the space provided, then add the applicable requirements to the appropriate areas of the mark-up of the existing ROP.

Questions H6 to H14

The ROP application package must contain sufficient information to determine all applicable requirements that the source is subject to. Sources must not only identify the applicable requirement but also provide justification as to why they are subject to the particular requirement. Questions H6 – H14 are used to justify proposed additions, changes, or deletions to the specific applicable requirement types found in the ROP (e.g., emission limits, material limits, process/operational restrictions, etc.) Limited space is provided in these fields because the justification provided should be concise. An Additional Information Form may be used if additional space for a given justification is necessary. Sources that have multiple types of changes to incorporate may utilize multiple copies of Part H to keep the proposed changes separate. For example, if the source needs to incorporate requirements from two MACT standards, two separate Part H documents may be created.

In the field provided, enter the justification for making the change to the particular requirement type. In these fields the source will explain “why” that requirement should be added, changed, or deleted. For example, the justification in H7 to incorporate a new emission limit from a new MACT standard may be that the coating operation uses a type of coating that triggers the limit (Figure 8). Other rationale for justifying a change may be due to the size of the affected source, types of materials used, or types of fuels, etc.

<p>H7. Does the source propose to add, change and/or delete emission limit requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>EU-COAT2 uses High Performance Coatings and is subject to applicable emission limits.</p>

Figure 8: Question H7 Example

If a monitoring/recordkeeping option is being proposed, the source will need to include justification related to why that monitoring option is being included and for which limit or restriction it demonstrates compliance (Figure 9).

The ROP program requires a method to determine compliance with each and every emission limit, material limit, visible emission limit, and operational restriction. This is accomplished through monitoring, testing, recordkeeping and/or reporting requirements, which may already exist in a PTI or an ROP. If a limit or restriction in the existing ROP, unincorporated PTI, or other regulations, does not have an associated monitoring, testing, recordkeeping and/or reporting requirement, then compliance demonstration requirements must be proposed by the applicant.

If multiple options to demonstrate compliance exist, it should be clear in your justification which option(s) have been chosen to comply with the applicable standard or rule and why.

<p>H12. Does the source propose to add, change and/or delete monitoring/recordkeeping requirements? If Yes, identify the addition/change/deletion in a mark-up of the corresponding section of the ROP and provide a justification below.</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Proposed change incorporates the monitoring/recordkeeping requirements for the compliant coating and emission rate without add-on controls options under 40 CFR 63.3930, 63.3941 and 63.3951. This is used to demonstrate compliance with emission limits in 40 CFR 63.3890.</p>

Figure 9: Question H12 Example

In addition to the justification made on the form, the applicant needs to identify the specific change, addition, or deletion on the mark-up of the existing ROP where appropriate (see page 29 for instructions on how to mark up the ROP).

If the change involves adding NEW applicable requirements (e.g. incorporating a new standard), you can use blank emission unit/flexible group tables or a regulation-specific emission unit/flexible group template provided by the AQD, which can be accessed at www.deq.state.mi.us/aps.

The blank emission unit/flexible group table may be used to incorporate the necessary conditions from a rule or standard in the proper format for the ROP. Copy the specific requirement (e.g., emission

limit, material limit, etc) from the standard and paste it into the appropriate part of the blank template. Also, enter the specific UAR in parenthesis after the requirement. Call the AQD district office contact or review existing templates to obtain additional template examples if needed.

Applicable Requirement Templates

The DEQ has developed several templates that may be used to incorporate the applicable requirements from various standards. These templates can be found at www.deq.state.mi.us/aps. Download the template and make the necessary revisions to it. The template should be included as part of the mark up of your existing ROP. Even if using a template, answer the questions in H6-H14 and provide justification.

For example, if emission units at your facility have recently become subject to the RICE MACT, you can download the RICE MACT template, select the appropriate conditions from the template, and include the template as part of your ROP application. Complete Part H of the application to indicate that you propose to add the requirements from the standard and for questions H6-H14.

Source-wide Requirements

Source-wide requirements must be included in the ROP application package. These are any applicable requirements that apply to the entire stationary source. For example, a synthetic minor Hazardous Air Pollutant (HAP) emission limit and associated recordkeeping that applies to the entire stationary source. Source-wide applicable requirements do not require the creation of an emission unit or flexible group. However, each source-wide requirement that is added, changed or deleted must be identified on Part H.

Non-Applicable or Obsolete Requirements

The ROP application package may be used to identify a specific requirement that the source proposes to be identified in the ROP as not applicable because it might logically otherwise be expected to apply (e.g. confirmation that the emission unit is not subject to a specific New Source Performance Standard). These requirements should be identified on Part H of the ROP Renewal Application Form with justification to support why it is not applicable. Part H may also be used to propose deletion of an obsolete applicable requirement. The justification for each request must also be included on Part H. If additional space is needed for a complete explanation of the request, complete and attach an AI-001 Form.

Streamlined Requirements

The ROP application package may be used to propose that the ROP identify a particular applicable requirement as being consolidated under a more stringent or equivalent applicable requirement (i.e. propose to subsume or streamline the applicable requirement). The overall objective would be to establish the most stringent permit condition that will assure compliance with all related applicable requirements for an emission unit or flexible group so as to eliminate redundant or conflicting requirements. Any streamlined requirements must be addressed in Part H of the ROP Renewal Application Form. If you are proposing that a requirement be subsumed, you must identify the conditions as well as the applicable requirements that you are subsuming, along with a justification pursuant to Rule 212(5) as to why you are proposing the streamlining. Additional information necessary to complete an explanation for streamlining requirements may be done on an AI-001 Form. If additional space is needed for a complete explanation of the request, complete and attach an AI-001 Form. More information about subsuming requirements can be found in the guidance at www.deq.state.mi.us/aps.

Alternative Operating Scenario Proposals

Pursuant to [Rule 213\(8\)](#), the ROP application package may be used to propose terms and conditions for an alternative operating scenario. The justification for each request must also be included on Part H of the ROP Renewal Application Form. If additional space is needed for a complete explanation of the request, complete and attach an AI-001 Form.

Intra-Facility Emission Trading Proposals

Pursuant to [Rule 213\(9\)](#), the ROP application package also may be used to propose terms and conditions for the trading of emissions increases and decreases among process and process equipment within the stationary source solely for the purposes of complying with an emissions cap that is established in the ROP independent of otherwise applicable requirements. The justification for each request must also be included on Part H of the ROP Renewal Application Form. If additional space is needed for a complete explanation of the request, complete and attach an AI-001 Form.

THE ADDITIONAL INFORMATION FORM (AI-001)

The Additional Information Form, AI-001, is used to submit information or attachments to supplement the specific information requested in the application. In several places throughout the application form you may be asked to submit an AI-001 Form to provide further details about your answer to a particular question. The AI-001 Form may include a narrative description and any other information that the applicant feels is necessary to supplement the specific information requested.

Completion Instructions

After each part of the ROP application form, there is a box that asks if an AI-001 Form is attached to provide more information for that part. If you are completing an AI-001 Form for that part, you should check the box where indicated and include the AI-001 Form ID you created on the corresponding AI-001 Form (Figure 10). This will help the permit reviewer to locate the AI-001 Form that supplements that part of the application.

<input checked="" type="checkbox"/> Check here if an AI-001 form is attached to provide more information for Part D. Enter AI-001 form ID: AI-PART-E
--

Figure 10: AI-001 Form Check Box

- 1. Operator's Additional Information ID:** Enter a unique ID for this Additional Information Form. The ID should correlate to the Part of the application it is supplementing (e.g. AI-PARTB, AI-PARTE).
- 2. Is This Information Confidential?:** Only certain information can be kept confidential (see below). If the information meets the criteria to be considered confidential then it must be submitted in a sealed envelope stamped CONFIDENTIAL and labeled with the SRN, Source/Section Name, and ROP Section Number. Any information submitted as confidential must also be submitted by the applicant directly to the USEPA at: United States Environmental Protection Agency, Region 5, 77 West Jackson Blvd., Chicago, IL 60604. Select "Yes" if the information you wish to add as supplemental is considered confidential. In the narrative area of the form DO NOT include the confidential information, but rather enter the following text "Confidential Data has been submitted in a separate envelope that is marked 'CONFIDENTIAL'."

Confidential Information

Section 5516 (3) of Act 451 provides for information submitted in a permit application to be kept confidential, upon request by the applicant. The information that is to remain confidential must be a trade secret or secret process, or production, commercial, or financial information which would jeopardize the competitive position of the applicant upon disclosure. This type of information can be kept confidential and will not be available for review by the general public. However, if a request for public records is made under Section 5 of the Freedom of Information Act, Act No. 422 of the Public Acts of 1976, Section 15.235 of the Michigan Compiled Laws, the department shall notify the applicant of such request. The applicant has 25 days after receipt of notice to demonstrate that the confidential information should not be disclosed. Data on the quantity, composition, or quality of emissions from any stationary source cannot be kept confidential and shall be made available to the public.

Refer to [Operational Memorandum No. 10 – Procedures for Handling of Confidential Materials and Freedom of Information Requests for Confidential Material](#) for details

3. **Narrative:** Provide a description of the additional information or attachments in this field. If you want to add supplemental information on different topics, be sure to separate the different topics using spaces, numbers, or titles. You may refer to other documents in this field which have already been prepared (e.g., compliance plans, site diagrams, stack layouts, calculations). In addition, if the information you wish to include was already entered onto a different AI-001 Form, you can simply refer to the other AI-001 Form instead of re-entering it onto this form. Although you have unlimited space to write your narrative electronically, when you print this form it may be broken into several pages.

Michigan Department Of Natural Resources and Environment - Air Quality Division RENEWABLE OPERATING PERMIT APPLICATION AI-001: ADDITIONAL INFORMATION	
This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.	
Form Type AI-001	SRN Z9999
1. Operator's Additional Information ID AI PART E	
Additional Information	
2. Is This Information Confidential? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3. Narrative Question E3: We are proposing to delete the testing condition under #V1 in EUSPECIALCOAT table. This testing has been conducted and the condition is now obsolete.	
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ROP MARK-UP INSTRUCTIONS

An administratively complete ROP renewal application must also include a mark-up version of the source's existing ROP. The mark-up of the existing ROP allows the source to show what changes they propose to make on the actual ROP document. The mark-up should be done electronically in Microsoft Word software if the application package will be submitted in electronic format. This section of the instructions provides guidance on how to appropriately markup the existing ROP document.

INSTRUCTIONS

Step 1: Download a Microsoft Word version of the source's existing ROP.

A Word version of the ROP can be accessed at www.deq.state.mi.us/aps (click on "Source Lists").

Step 2: Make appropriate changes.

Identify where changes should be made to the existing document. These changes should have been identified in the various parts of the application form as explained previously in these instructions (see "Format for Mark-up Changes" below). The "Track Changes" feature in the Microsoft Word version of the existing ROP will automatically be enabled and password protected. All changes to the ROP document will be displayed and reviewable.

Step 3: Save the Mark-up document.

Rename the document as "[your SRN]_ROP_MARK-UP" (e.g., "Z9999_ROP_MARK-UP").

Step 4: Print a Mark-up copy.

This should be included in the hard copy version of the ROP renewal application package that will be submitted to the AQD along with the electronic version.

FORMAT FOR MARK-UP CHANGES

At a minimum, each added/changed condition should include the proposed rule text followed by the underlying applicable requirement(s) (UAR) reference in parenthesis. The UAR is the state rule(s) or federal regulation(s) on which the applicable requirement is based. The UAR is typically identified in existing NSR Permits and ROPs. All UARs should be entered using the following formats:

- State Rules: R 336.1201(1)(a)(iv)
- Federal Regulations: 40 CFR 60.1(a)(1)(iv)(B)
- Consent Order: Paragraph 5(a)(3), Consent Order AQD No. 35-2011

The applicable requirement may have more than one underlying applicable requirement. Enter all state rules and/or federal regulations that apply.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-COLDCLNRS	Cold cleaners used in the building.	11/89	FG-COLD CLEANERS
EU-PRINT	Printing processes utilizing UV curing ink and clean-up using isopropyl alcohol in the plant.	4/1/1960	FG-RULE290
EU-EXTRUDER	Includes extruder used to recycle foam polystyrene, both pre and post consumer.	7/1/1990	NA
EU-BOILER5 <u>(dismantled 7/28/09 and replaced with EU-BOILER9)</u>	Boiler #5-600 HP Steam Boiler-natural gas #2 fuel oil backup.	1/1/1970	FG-BOILERS
EU-BOILER7	Boiler #7-700 HP Steam Boiler-natural gas #2 fuel oil backup.	1/1/1976	FG-BOILERS
EU-BOILER8	Boiler #8-800 HP Steam Boiler-natural gas #2 fuel oil backup.	1/1/1987	FG-BOILERS
<u>EU-BOILER9</u>	<u>Boiler #9 – 500 hp Steam Boiler – natural gas - #2 fuel oil back up</u>	<u>9/1/09</u>	<u>FG-BOILERS</u>

Figure 11: Mark-up of Emission Unit Summary Table in ROP

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The permittee shall not operate any spray booth portion of FGCOATINGLN unless its respective waterwash, the dry filter particulate control is installed and operating in a satisfactory manner.² (R 336.1224, R 336.1901, R 336.1910;)
2. The permittee shall not operate any spray booth portion of FGCOATINGLN unless the thermal oxidizer is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes a minimum VOC capture efficiency of 100 percent (by weight), a minimum VOC destruction efficiency of 95 percent (by weight), and maintaining a minimum temperature of 1400 1500 °F and a minimum retention time of 0.5 seconds.² (R 336.1220, R 336.1224, R 336.1225, R 336.1702, R 336.1901, R 336.1910;)
- ~~3. The permittee shall equip and maintain all basecoat and clearcoat spray booth portions of FGCOATINGLN with electrostatic applicators or equivalent technology with comparable transfer efficiency.² (R 336.1220, R 336.1702)~~
- ~~4. The permittee shall equip and maintain all electrostatic applicator portions of FGCOATINGLN with a device to prevent electric current from being shut off except by authorized personnel.² (R 336.1220, R 336.1702; Consent Order No. 29-2006, Paragraph 10)~~

Figure 12: Mark-up of Requirements in ROP

What if the source is NOT proposing any changes to the existing ROP?

Sources that want to keep all conditions as they currently are in the existing ROP and not add, delete, or change any of the existing conditions will still need to create a mark-up version of the ROP as explained in steps 1-4. It is recommended that on the front page of the ROP document, the applicant types “KEEP ALL CONDITIONS – NO CHANGES, ADDITIONS, OR DELETIONS” (Figure 13).

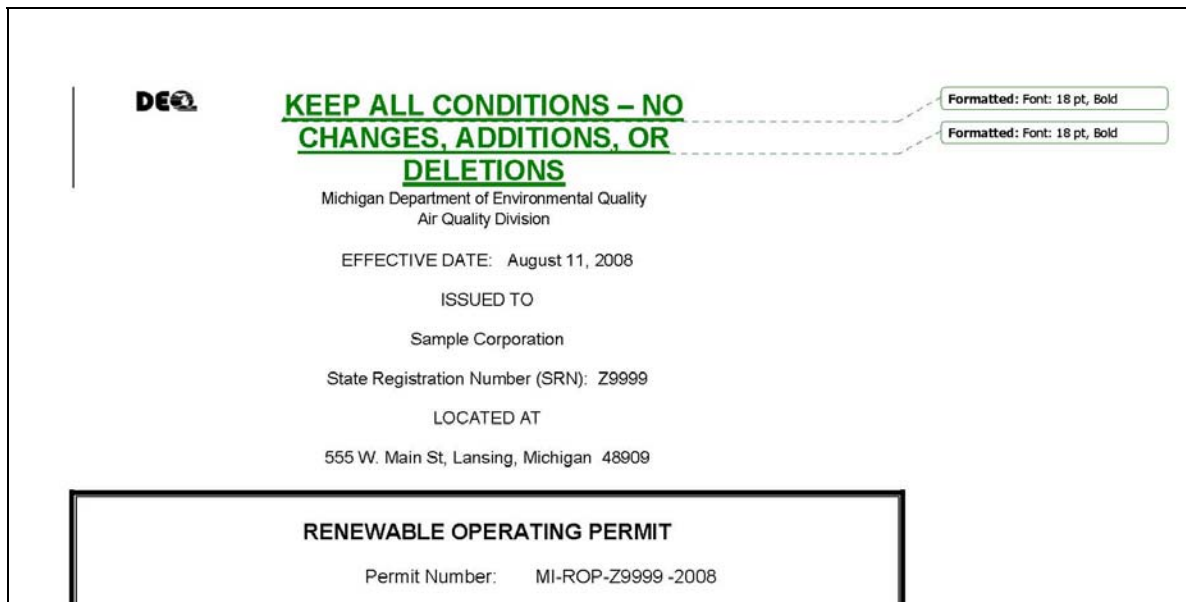


Figure 13: No Changes to ROP Mark-up

SUBMITTING YOUR ROP RENEWAL APPLICATION

As mentioned previously, the ROP application consists of the application form, a mark-up copy of the existing ROP, and any other necessary supplemental data. All information must be submitted for the application to be considered administratively complete. Follow the steps below to submit your application.

Step 1: Review application for administrative completeness

Review all answers to the questions contained in the ROP application form. All questions must be answered unless directed to do otherwise. Be sure that any supplemental information that must be submitted is identified in the table in Part B and included with the application package.

Step 2: Print a paper (hard copy) version

You are required to submit a hard copy of the entire application package. Print the completed application form, a mark-up copy of the ROP (showing the mark ups), and any supplemental data you are submitting (e.g., MAERS forms, Permits to Install referenced in Part F of the application form, new CO/CJ, etc.).

Step 3: Sign Application

The Responsible Official must sign where indicated in Part B of the ROP application form. The AQD requires that a hard copy with an original signature by the Responsible Official be mailed/delivered to the AQD district office.

Step 4: Send electronic version of ROP Application Package

Although an electronic version is not required, it is necessary for a 15 day administrative completeness review by the AQD (see "What's Next?" below).

Attach all the files to an e-mail and send them to DEQ-ROP@michigan.gov.

Be sure to include the following text in the subject line of your email:

"[Your SRN] – ROP Renewal Application"

The files should be attached in the following order:

- ROP Application Form
- ROP mark-up (Microsoft Word version)
- Supplemental Data
- Plans referenced in the ROP

If you have trouble submitting the documents via e-mail, you can contact your AQD district office for instructions to post the application on the state's server, or you may copy the files onto a CD or DVD and mail it to the appropriate AQD district office.

Step 5: Mail Hard-Copy of ROP Application Package

Mail the application package to the appropriate district office to the attention of the AQD District Supervisor. District office addresses are provided in Appendix E.

What's Next?

Upon receipt of the hard copy of your ROP Application Package, the AQD will review it for administrative completeness. If you submit all the necessary files in BOTH electronic and hard copy format, the AQD will review the application within 15 days to determine administrative completeness.

If your source submits only a hard copy of the application, the AQD may take up to 60 days to review it for administrative completeness. **Note that the review period begins when the AQD receives the signed, hard copy version of the application, not the electronic version.**

Be sure that your application package is submitted well before the submittal deadline, which is six months prior to the expiration of the permit. When submitting your application you should consider the time it will take for the AQD to review the application (15 days for electronic and 60 days for hard copy) and any turn-around time that may be needed to fix issues, should the AQD determine that the application is not administratively complete.

APPENDIX A ACRONYMS & DEFINITIONS

AQD.....	Air Quality Division (of DEQ)
BACT.....	Best Available Control Technology
CAA.....	Clean Air Act
CFC.....	Chlorofluorocarbon
CFR.....	Code of Federal Regulations
CJ.....	Consent Judgment
CO.....	Consent Order
DEQ.....	Michigan Department of Environmental Quality
EPA.....	United States Environmental Protection Agency
GHG.....	Greenhouse Gas
HAP.....	Hazardous Air Pollutant
MACT.....	Maximum Achievable Control Technology
MAERS.....	Michigan Air Emissions Reporting System
NAAQS.....	National Ambient Air Quality Standard
NAICS.....	North American Industrial Classification System
NESHAP.....	National Emission Standard for Hazardous Air Pollutant(s)
NREPA.....	Natural Resources and Environmental Protection Act (Public Act 451 of 1994)
NSPS.....	New Source Performance Standard
NSR.....	New Source Review
PASS.....	Permit Application Submittal System
PSD.....	Prevention of Significant Deterioration
PTE.....	Potential to Emit
PTI.....	Permit to Install
RMP.....	Risk Management Plan
ROP.....	Renewable Operating Permit
SIC.....	Standard Industrial Classification
VOC.....	Volatile Organic Compound

DEFINITIONS

Actual Emissions: Amount of air contaminants emitted from a facility or process device over a given period of time, usually expressed as tons of air contaminant emitted per year (tons/yr). Facilities having to apply for a ROP are subject to an annual fee based partly on their actual emissions.

Air Contaminant: Defined in [Rule 101\(f\)](#) of the Michigan Air Pollution Control Rules as a dust, fume, gas, mist odor, smoke, vapor or any combination thereof.

Applicable Requirement: All federal and state air quality rules, regulations, permits, orders, and judgments that apply to process devices at a facility. *This term is further defined in Rule 101(o) of the Michigan Air Pollution Control Rules (see Appendix B for the rule).*

Application Shield: Defined in [Rule 210\(1\)](#) of the Michigan Air Pollution Control Rules as the ability to operate process and process equipment at a stationary source while a timely and administratively complete application is being reviewed and acted upon by the department. An application is considered timely pursuant to Rule 210(4)-(7) and it is considered administratively complete pursuant to Rule 210(2). Failure to provide a timely response to information requests may result in loss of the application shield. Loss of the application shield is grounds for enforcement action pursuant to Rule 210(1).

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

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

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

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

Emission Limit: Restriction on the amount of a particular air contaminant that can be released from an emission unit or facility over a specified time period. Emission limits are commonly expressed as a concentration (grains per dry standard cubic foot) or rate (pounds per hour).

Emission Thresholds: Levels of emission rates (pounds/hour or tons/year) above which certain rules or permit requirements apply.

Emission Unit: A device or a group of devices that operate together with a dependency between devices. An emission unit contains one or more process devices and zero or more control devices and related stacks. See [Operational Memorandum No. 6 – Procedures for Determining Emission Units](#) for additional guidance on determining emission units. *This term is further defined in R 336.1105(b) of the Michigan Air Pollution Control Rules.*

Facility: See definition of “stationary source.”

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

Greenhouse Gas: a single air pollutant defined as the aggregate group of the following six gases:

- carbon dioxide (CO₂)
- nitrous oxide (N₂O)
- methane (CH₄)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF₆)

Hazardous Air Pollutants (HAPs): Air pollutants that are not covered by ambient air quality standards but which, as defined in the CAA, may reasonably be expected to cause or contribute to irreversible illness or death. The HAPs are defined in Section 112(b) of the CAA and listed in 40 CFR, Part 63, [Subpart C](#). A complete list of HAPs can be viewed at the USEPA web site www.epa.gov/ttn/atw/pollsour.html.

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

- AI - Additional Information
- EU - Emission Unit (including exempt EU)
- FG – Flexible Group

Major Source: Any facility emitting or having the potential to emit 10 tons per year of any hazardous air pollutant (HAP), 25 tons per year of any combination of HAPs, or 100 tons per year of any regulated air contaminant. *This term is further defined in 40 CFR, Part 70 – State Operating Permit Programs (70.2 Definitions).* Access 40 CFR 70.2 at www.epa.gov/lawsregs/search/40cfr.html.

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

Modification: Making a physical or operational change in an existing emission unit which will increase the amount of any air contaminant not already allowed to be emitted under the conditions of a current permit or order. Also, a modification cannot result in the emission of any toxic air contaminant into the outer air not previously emitted. An increase in the hours of operation or an increase in the production rate up to the maximum capacity of the process or process equipment shall not be considered to be a change in the method of operation. The exception to this is if the process equipment is subject to enforceable permit conditions or enforceable orders which limit the production rate or the hours of operation; or both, to a level below the proposed increase. *This term is further defined in R 336.1113(e) of the Michigan Air Pollution Control Rules (see Appendix B for the rule).*

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

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

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

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

Permit to install: Permit issued by the Michigan Department of Environmental Quality that authorizes the installation of new equipment or the modification of existing equipment that emits air contaminants. According to [R 336.1201](#) (Rule 201) of the Michigan Air Pollution Control Rules, a person must apply for and receive an approved permit to install before beginning the installation of a process. The purpose of the permit is to ensure that the proposed process will comply with all of the applicable state and federal air quality requirements at the time it begins operation. The process involved in the issuance of the Permit to Install is sometimes referred to as New Source Review (NSR).

Potential to Emit (PTE): The maximum capacity of a stationary source to emit an air contaminant under its current physical and operational design. Any physical or operational limit on the capacity of the stationary source to emit an air contaminant (e.g., air pollution control equipment, restrictions on hours of operation, the type or amount of material combusted, stored or processed) shall be treated as part of its design only if such limit, or the effect it would have on emissions, is legally enforceable. For more information about determining potential to emit go to www.michigan.gov/air (select "Clean Air Assistance" then "Potential to Emit"). *This term is further defined in [R 336.1116\(m\)](#) of the Michigan Air Pollution Control Rules.*

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

Process device: Equipment or activity that generates air contaminants, e.g. boiler.

Reconstruction: The replacement of components of an existing emission unit so that the fixed capital cost of the new components is more than 50 percent of the fixed capital cost that would be required to construct a comparable new emission unit and so that it is technologically and economically feasible to meet the applicable requirement. *This term is further defined in [R 336.1118\(b\)](#) of the Michigan Air Pollution Control Rules (see [Appendix B](#) for the rule).*

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

Renewable operating permit (ROP) (Title V permit): Air emission permit issued under Rules 210 through 218 of the Michigan Air Pollution Control Rules and 40 CFR 70.

Responsible Official: Defined in [R 336.1118\(j\)](#) of the Michigan Air Pollution Control Rules (see [Appendix B](#) for the rule).

SIC code: The Standard Industrial Classification (SIC) code is a numerical indicator of the primary type of activity at a business. For example, 5153 is a grain elevator, 2951 is an asphalt plant, etc. The first two digits indicate the broad category, the second two digits are more industry-specific.

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

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

Stationary Source: All buildings, structures, facilities, or installations that emit or have the potential to emit air contaminants, are under the control of the same person, and have the same 2-digit major group code associated with their primary activity (including those with a different 2-digit major group code that support the primary activity). *This term is further defined in R 336.1119(r) of the Michigan Air Pollution Control Rules.* See also *Operational Memorandum No. 11 – Stationary Source Determinations* for details regarding stationary source determinations.

Title V: Refers to [Title V](#) of the CAA Amendments of 1990, which established the requirements for the ROP Program.

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

APPENDIX B

Rules Cited

Note: This appendix provides a number of the rules cited in this document. You can view all the [Michigan Air Pollution Control Rules](http://www.michigan.gov/air) via the Internet at: www.michigan.gov/air (click on "Laws and Rules" then "Air Pollution Control Rules").

R 336.1101(o) [Rule 101(o)]

(o) "**Applicable requirement**" means any of the following as they apply to process or process equipment, including requirements that have been approved as administrative rules under the act pursuant to 1969 PA 306, MCL 24.201 et seq. or promulgated by the United States environmental protection agency through final rulemaking at the time of issuance of a permit under the act and which will become effective during the permit term:

(i) A standard or other requirement provided for in the Michigan state implementation plan, as approved or promulgated by the United States environmental protection agency through rulemaking under title I of the clean air act, that implements the relevant requirements of the clean air act, including any revisions to that plan promulgated in 40 C.F.R. part 52.

(ii) A standard or requirement enacted as a part of the act or promulgated in administrative rules pursuant to the act.

(iii) A term or condition of any permit issued pursuant to the act or regulations approved or promulgated through rulemaking under title I, including parts c or d, of the clean air act.

(iv) A term or condition of an order entered pursuant to the act that is necessary to ensure or demonstrate compliance with any other applicable requirement.

(v) A term or condition of a permit issued by the United States environmental protection agency pursuant to title I, subpart c, of the clean air act.

(vi) A term or condition of any permit issued pursuant to the Wayne county air pollution control ordinance, adopted pursuant to the home rule charter for Wayne county, resolution no. 85-305, as amended by resolution no. 89-213.

(vii) A term or condition of an order entered pursuant to the Wayne county air pollution control ordinance, adopted pursuant to the home rule charter for Wayne county, resolution no. 85-305, as amended by resolution no. 89-213, that is necessary to ensure or demonstrate compliance with any other applicable requirement.

(viii) A standard or other requirement under the clean air act, including any of the following:

(A) A standard for the performance of new stationary sources or other requirement under section 111 of the clean air act, including section 111(d).

(B) A standard for hazardous air pollutants or other requirement under section 112 of the clean air act, including any requirement concerning accident prevention under section 112(r)(7) of the clean air act.

(C) A standard or other requirement of the acid rain program under title IV of the clean air act or the regulations promulgated thereunder.

(D) A requirement for enhanced monitoring established pursuant to sections 114(a)(3) or 504(b) of the clean air act.

(E) A standard or other requirement governing solid waste incineration under section 129 of the clean air act.

(F) A standard or other requirement for consumer and commercial products under section 183(e) of the clean air act.

(G) A standard or other requirement for tank vessels under section 183(f) of the clean air act.

(H) A standard or other requirement of the regulations promulgated to protect stratospheric ozone under title VI of the clean air act, unless the administrator of the United States environmental protection agency has determined that the standard or requirement need not be contained in a renewable operating permit required under title V of the clean air act.

(l) A national ambient air quality standard or increment or visibility requirement under part C of title I of the clean air act, but only as it would apply to temporary sources.

Any applicable requirement which results solely from the requirements of the act, the rules promulgated under the act, or the home rule charter for Wayne county, resolution no. 85-305, as amended by resolution no. 89-213, shall not be enforceable under the clean air act.

R 336.1103(dd) [Rule 103(dd)]

(dd) "**Compliance plan**" means a description of the compliance status of a source with respect to all applicable requirements for each process or process equipment as follows:

(i) For applicable requirements with which the source is in compliance, a statement that the source will continue to comply with the requirements.

(ii) For applicable requirements that will become effective during the permit term, a statement that the source will meet the requirements on a timely basis.

(iii) For applicable requirements for which the stationary source is not in compliance at the time of permit issuance, a narrative description of how the stationary source will achieve compliance with the requirements.

R 336.1105(b) [Rule 105(b)]

(b) "**Emission unit**" means any part of a stationary source that emits or has the potential to emit an air contaminant. Examples of emission units include the following:

(i) A fossil fuel-fired, steam-generating unit.

(ii) A topcoat painting line.

(iii) A solid waste incinerator.

(iv) A clinker cooler at a Portland cement plant.

(v) A process unit at a chemical plant.

R 336.1113(e) [Rule 113(e)]

(e) "**Modify**" means making a physical change in, or change in the method of operation of, existing process or process equipment which increases the amount of any air contaminant emitted into the outer air which is not already allowed to be emitted under the conditions of a permit or order or which results in the emission of any toxic air contaminant into the outer air not previously emitted. An increase in the hours of operation or an increase in the production rate up to the maximum capacity of the process or process equipment shall not be considered to be a change in the method of operation unless the process or process equipment is subject to enforce-able permit conditions or enforceable orders which limit the production rate or the hours of operation, or both, to a level below the proposed increase.

R 336.1118(b) [Rule 118(b)]

(b) "**Reconstruction**" means the replacement of components of an existing facility so that the fixed capital cost of the new components is more than 50% of the fixed capital cost that would be required to construct a comparable entirely new emission unit and so that it is technologically and economically feasible to meet the applicable requirement.

"Fixed capital cost," as used in this subdivision, means the capital needed to provide all of the depreciable components.

R 336.1118(j) [Rule 118(j)]

(j) "**Responsible official**" means, for the purposes of signing and certifying the truth, accuracy, and completeness of permit applications, monitoring and other reports, and compliance certifications, any of the following:

(i) For a corporation, a president, secretary, treasurer, or vice-president of the corporation who is in charge of a principal business function or any other person who performs similar policy or decision-making functions for the corporation. The person identified in the preceding sentence may appoint another person as his or her authorized representative under either of the following circumstances:

(A) The representative is responsible for the overall operation of 1 or more manufacturing, production, or operating facilities applying for or subject to a permit and either the facilities employ more than 250 persons or have gross annual sales or expenditures of more than \$25,000,000.00.

(B) The representative has responsibilities for the overall operation of a source and is approved in advance by the department. A responsible official shall submit a written request for approval from the department to designate an authorized representative pursuant to this paragraph. The department shall respond, in writing, within 30 days of receipt of the request.

(ii) For a partnership or sole proprietorship, a general partner or the proprietor.

(iii) For a county, city, village, township, state, federal, or other public agency, either a principal executive officer or ranking elected official. For this purpose, a principal executive officer includes the chief executive officer who has responsibility for the overall operations of a principal geographic unit of the agency.

(iv) For affected sources under title IV of the clean air act, the designated representative as defined in title IV of the clean air act.

R 336.1119(a) [Rule 119(a)]

(a) "**Schedule of compliance**" means, for purposes of R 336.1201 to R 336.1218, all of the following:

(i) For a source not in compliance with all applicable requirements at the time of issuance of a renewable operating permit, a schedule of remedial measures, including an enforceable sequence of actions or operations that specifies milestones, leading to compliance with an applicable requirement, and a schedule for submission of certified progress reports, at least every 6 months. The schedule shall resemble, and be at least as stringent as, a schedule contained in a judicial consent decree or administrative order to which the source is subject. A schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirement on which it is based.

(ii) For a source in compliance with all applicable requirements at the time of issuance of a renewable operating permit, a statement that the source will continue to comply with the requirements.

(iii) With respect to any applicable requirement that has a future effective compliance date that is after the date of issuance and before the date of expiration of the renewable operating permit, the schedule of compliance shall contain a statement that the source will meet the requirement on a timely basis, unless the underlying applicable requirement requires a more detailed schedule.

R 336.1204 Authority of agents.

Rule 204. When a person files an application for a permit to install as the agent of an applicant, the applicant shall furnish the department with written authorization for the filing of the application. The authorization shall indicate if the applicant intends that the department contact the agent directly with questions regarding the application and also indicate if the agent is authorized to negotiate the terms and conditions of the permit to install.

R 336.1212 Administratively complete applications; insignificant activities; streamlining applicable requirements; emissions reporting and fee calculations.

Rule 212. (1) A timely and administratively complete application for a stationary source subject to the requirements of R 336.1210 shall meet the requirements of R 336.1210(2) and shall contain all information that is necessary to implement and enforce all applicable requirements that include a process-specific emission limitation or standard or to determine the applicability of those requirements.

(2) All of the following activities are considered to be insignificant activities at a stationary source and need not be included in an administratively complete application for a renewable operating permit:

(a) Repair and maintenance of grounds and structures.

(b) All activities and changes pursuant to R 336.1285(a) to (f); however, if any compliance monitoring requirements in the renewable operating permit would be affected by the change, then application shall be made to revise the permit pursuant to R 336.1216.

(c) All activities and changes pursuant to R 336.1287(f) to (h); however, if any compliance monitoring requirements in the renewable operating permit would be affected by the change, then application shall be made to revise the permit pursuant to R 336.1216.

(d) Use of office supplies.

(e) Use of housekeeping and janitorial supplies.

(f) Sanitary plumbing and associated stacks or vents.

(g) Temporary activities related to the construction or dismantlement of buildings, utility lines, pipelines, wells, earthworks, or other structures.

(h) Storage and handling of drums or other transportable containers that are sealed during storage and handling.

(i) Fire protection equipment, fire fighting and training in preparation for fighting fires. Prior approval by the department for open burning associated with training in preparation for fighting fires is required pursuant to R 336.1310.

(j) Use, servicing, and maintenance of motor vehicles, including cars, trucks, lift trucks, locomotives, aircraft, or watercraft, except where the activity is subject to an applicable requirement. The applicable requirement or the emissions of those air contaminants addressed by the applicable requirement shall be included in a timely and administratively complete application pursuant to R 336.1210. Examples of applicable requirements may include an applicable requirement for a fugitive dust control or operating program or an applicable requirement to include fugitive emissions pursuant to R 336.1211(1)(a)(ii). For the purpose of this subdivision, the maintenance of motor vehicles does not include painting or refinishing.

(k) Construction, repair, and maintenance of roads or other paved or unpaved areas, except where the activities are subject to an applicable requirement. The applicable requirement or the emissions of the air contaminants addressed by the applicable requirement shall be included in a timely and administratively complete application pursuant to R 336.1210. Examples of applicable requirements include an applicable requirement for a fugitive dust control or operating program or an applicable requirement to include fugitive emissions pursuant to R 336.1211(1)(a)(ii).

(l) Piping and storage of sweet natural gas, including venting from pressure relief valves and purging of gas lines.

(3) The following process or process equipment need not be included in an administratively complete application for a renewable operating permit, unless the process or process equipment is subject to applicable requirements that include a process-specific emission limitation or standard:

(a) All cooling and ventilation equipment listed in R 336.1280.

(b) Cleaning, washing, and drying equipment listed in R 336.1281(a) to (f) and (i).

(c) Electrically heated furnaces, ovens, and heaters listed in R 336.1282(a).

(d) All other equipment listed in R 336.1283.

(e) Containers listed in R 336.1284(a), (c), (d), (h), and (j) to (m).

(f) Miscellaneous equipment listed in R 336.1285(h) to (p), (r) to (t), (v) to (ii), (kk), and (ll) except for externally vented equipment listed in R 336.1285(l)(vi).

(g) All plastic processing equipment listed in R 336.1286.

(h) Surface coating equipment listed in R 336.1287(b), (d), (e), (i), (j), and (k).

(i) All oil and gas processing equipment listed in R 336.1288.

(j) Asphalt and concrete production equipment listed in R 336.1289(a) to (c).

(4) Unless subject to a process-specific emission limitation or standard, all of the following process or process equipment need only be listed in an administratively complete application for a renewable operating permit. The list shall include a description of the process or process equipment, including any control equipment pertaining to the process or process equipment, the source classification code (SCC), and a reference to the subdivision of this subrule that identifies the process or process equipment:

(a) Cleaning, washing, and drying equipment listed in R 336.1281(g), (h), and (j).

(b) Fuel-burning furnaces, ovens, and heaters listed in R 336.1282.

(c) Containers listed in R 336.1284(b), (e), (f), (g), and (i).

(d) Miscellaneous process or process equipment listed in R 336.1285(g), (q), (u), and (jj) and externally vented process equipment listed in R 336.1285(l)(vi).

(e) Surface-coating equipment listed in R 336.1287(a) and (c).

(f) Concrete batch production equipment listed in R 336.1289(d).

(g) Process or process equipment which has limited emissions and which is listed in R 336.1290.

(5) As a part of an application for a renewable operating permit, a person may seek to establish that certain terms or conditions of a permit to install, permit to operate, or order entered pursuant to the act are not appropriate to be incorporated into the renewable operating permit or should be modified to provide for consolidation or clarification of the applicable requirements. An application for a renewable operating permit may include information necessary to demonstrate any of the following:

(a) That a term or condition of a permit to install, permit to operate, or order entered pursuant to the act is no longer an applicable requirement.

(b) That a term or condition of a permit to install, permit to operate, or order entered pursuant to the act should be modified to provide for consolidation or clarification of the applicable requirement. A person shall demonstrate that the modification results in enforceable applicable requirements which are equivalent to the applicable requirements contained in the original permit or order and that the equivalent requirements do not violate any other applicable requirement.

(c) That the equipment should be combined into emission units different from the emission units contained in a permit to install, permit to operate, or order entered pursuant to the act to provide for consolidation or clarification of the applicable requirement. A person shall demonstrate that the realignment of the emission units results in enforceable applicable requirements which are equivalent to the applicable requirements contained in the original permit or order and that the equivalent requirements do not violate any other applicable requirement.

(6) Beginning with the annual report of emissions required pursuant to R 336.202 and section 5503(k) of the act for calendar year 1995, or the first calendar year after a stationary source becomes a major source as defined by R 336.1211(1)(a), whichever is later, each stationary source subject to the requirements of this rule shall report the emissions, or the information necessary to determine the emissions, of each regulated air pollutant. The information shall be submitted utilizing the emissions inventory forms provided by the department. For the purpose of this subrule, "regulated air pollutant" means all of the following:

(a) Nitrogen oxides or any volatile organic compound.

(b) A pollutant for which a national ambient air quality standard has been promulgated under the clean air act.

(c) A pollutant that is subject to any standard promulgated under section 111 of the clean air act.

(d) A class I or II substance that is subject to a standard promulgated under or established by title VI of the clean air act.

(e) A pollutant that is subject to a standard promulgated under section 112 or other requirements established under section 112 of the clean air act, except for pollutants regulated solely pursuant to section 112(r) of the clean air act. Pollutants subject to a standard promulgated or other requirements established under section 112 of the clean air act include both of the following:

(i) A pollutant that is subject to requirements under section 112(j) of the clean air act. If the administrator of the United States environmental protection agency fails to promulgate a standard by the date established pursuant to section 112(e) of the clean air act, any pollutant for which a stationary source would be major shall be considered to be regulated on the date 18 months after the applicable date established pursuant to section 112(e) of the clean air act.

(ii) A pollutant for which the requirements of section 112(g)(2) of the clean air act have been met, but only with respect to the specific stationary source that is subject to the section 112(g)(2) requirement.

(7) For the purpose of calculating the annual air quality fee pursuant to section 5522 of the act, the actual emissions of a fee-subject air pollutant from all process or process equipment shall be determined. However, the actual emissions of a fee-subject air pollutant from process or process equipment listed pursuant to subrules (2) to (4) of this rule need not be calculated unless either of the following provisions is met:

(a) The process or process equipment is subject to a process-specific emission limitation or standard for the specific fee-subject air pollutant.

(b) The actual emissions from the process or process equipment exceed 10% of significant, as defined in R 336.1119(e), for that air pollutant.

History: 1995 MR 7, Eff. July 26, 1995; 1996 MR 11, Eff. Dec. 12, 1996; 2001 MR 15, Eff. Aug 22, 2001; 2003 MR 12, Eff. July 1, 2003.

APPENDIX C

Calculating Greenhouse Gas (GHG) Mass-Based and CO₂e-Based Emissions

The following information is taken from the USEPA guidance document titled "PSD and Title V Permitting Guidance for Greenhouse Gases (November 2010). The document can be accessed at <http://www.epa.gov/nsr/ghgdocs/epa-hq-oar-2010-0841-0001.pdf>.

On January 2, 2011, information regarding GHG emissions and applicable requirements must be included in renewal applications.

On and after July 1, 2011 the following sources are subject to Title V permitting requirements as a result of their GHG emissions:

- Existing or newly constructed GHG emission sources (not already subject to Title V) that emit or have a PTE equal to or greater than:
 - 100,000 TPY CO₂e; and
 - 100 TPY GHGs on a mass basis

GHGs are a single air pollutant defined as the aggregate group of the following six gases:

- carbon dioxide (CO₂)
- nitrous oxide (N₂O)
- methane (CH₄)
- hydrofluorocarbons (HFCs)
- perfluorocarbons (PFCs)
- sulfur hexafluoride (SF₆)

CO₂e emissions are defined as the sum of the mass emissions of each individual GHG adjusted for its global warming potential (GWP). Since GWP values may vary, applicants should use the GWP values in Table A-1 of the Federal Greenhouse Gas Reporting Program (GHGRP) (40 CFR, Part 98, Subpart A, Table A-1). Access the regulation at <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>.

The following example illustrates the method to calculate GHG emissions on both a mass basis and CO₂e basis.

A source emits five of the six GHG compounds in the following amounts:

- 50,000 TPY of CO₂
- 60 TPY of methane
- 1 TPY of nitrous oxide
- 5 TPY of HFC-32 (a hydrofluorocarbon)
- 3 TPY of PFC-14 (a perfluorocarbon)

The Global Warming Potential (GWP) for each of the GHGs used in this example are:

GHG	GWP*
Carbon Dioxide	1
Nitrous Oxide	310
Methane	21
HFC-32	650
PFC-14	6,500

* as of the date of this document (see 40 CFR, Part 98, Subpart A, Table A-1)

The **GHGs mass-based emissions** of the unit are calculated as follows:

50,000 TPY + 60 TPY + 1 TPY + 5 TPY + 3TPY = **50,069 TPY of GHGs**

The **CO₂e-based emissions** of the unit are calculated as follows:

(50,000 TPY x 1) + (60 TPY x 21) + (1 TPY x 310) + (5 TPY x 650) + (3 TPY x 6,500)

= 50,000 + 1,260 + 310 + 3,250 + 19,500 = **74,320 TPY CO₂e**

The following are a number of methods that are traditionally used to estimate PTE from sources and relevant emissions units:

- Federally enforceable operational limits, including the effect of pollution control equipment;
- Performance test data on similar units;
- Equipment vendor emissions data and guarantees;
- Test data from EPA documents, including background information documents for new source performance standards, national emissions standards for hazardous air pollutants, and Section 111(d) standards for designated pollutants;
- AP-42 Emission Factors;
- Emission factors from technical literature; and
- State emission inventory questionnaires for comparable sources.

These approaches remain relevant for GHG emissions calculations and serve as the fundamental approaches to estimating emissions for permitting applications. For example, direct measurements methods such as continuous emissions monitors (CEMs) would continue to be a preferred means to form the starting point basis for estimating emissions from GHG emissions units. However, because GHG emissions historically have not been subject to regulation under air permitting programs, and there are unique GHG emission source categories, there is not as widespread representation or long-term experience with GHG estimation techniques and measurement methods as there is for conventional pollutants under the above approaches. The purpose of this appendix is to identify additional references and resources that may be useful when evaluating GHG emission sources and deciding which estimation methods to use.

Mandatory Reporting of Greenhouse Gases. This final rule was issued on October 30, 2009 (74 FR 56260), and established GHG reporting requirements for all sectors of the economy and should be considered a primary reference for sources and permitting authorities in estimating GHG emissions and establishing measurement techniques when preparing or processing permit applications. The rule includes procedures for estimating GHG emissions from the source categories that are responsible for the majority of stationary source GHG emissions in the United States. The procedures identify where applications of direct measurement techniques are viable and describes emission factor and mass-balance based approaches where direct measurement techniques are not applicable or available.

While the GHG mandatory reporting rule is focused on estimating and reporting *actual* emissions from source categories, the basic approaches can be used to estimate a source's PTE when correctly adjusted to reflect future conditions and operating parameters. Since many of the affected GHG source categories and emission units have been or will be subject to permitting requirements for conventional, non-GHG pollutants, sources should use similar adjustments to fuel throughput, activity data, and emissions for determining PTE for GHG that have been used in existing PSD and Title V guidance for those units and which are applied on a case-by-case basis depending on specific operating parameters for the affected sources. Other reference sources that may prove useful to sources and permitting authorities in identifying, characterizing and estimating emissions from GHG emission sources include the following:

- **ENERGY STAR Industrial Sector Energy Guides and Plant Energy Performance Indicators (benchmarks)** <http://www.energystar.gov/epis>
- **US EPA National Greenhouse Gas Inventory** <http://epa.gov/climatechange/emissions/usinventoryreport.html>
- **EPA's Climate Leaders Protocols** <http://www.epa.gov/stateply/index.html>

- **EPA's Voluntary Partnerships for GHG Reductions:**
 - Landfill Methane Outreach Program (<http://www.epa.gov/lmop/>)
 - CHP Partnership Program (<http://www.epa.gov/chp>)
 - Green Power Partnership (<http://www.epa.gov/greenpower>)
 - Coalbed Methane Outreach Program (<http://www.epa.gov/cmop/index.html>)
 - Natural Gas STAR Program (<http://www.epa.gov/gasstar/index.html>)
 - Voluntary Aluminum Industrial Partnership (<http://www.epa.gov/highgwp/aluminum-pfc/index.html>)

- **SF Emission Reduction Partnership for the Magnesium Industry:**
<http://www.epa.gov/highgwp/magnesium-sf6/index.html>

- **PFC Reduction/Climate Partnership for the Semiconductor Industry:**
<http://www.epa.gov/highgwp/semiconductor-pfc/index.html>

- **Landfill Gas Emissions Model:** User's Guide at: <http://www.epa.gov/ttnecat1/dir1/landgem-v302-guide.pdf>.

There are few distinct source categories and or specific GHG pollutants that are not represented in the reference sources noted above, that could potentially be subject to permitting requirements for GHGs. These include primarily biogenic CO2 emission sources, such as:

- Wastewater (CO2 from treatment processes and digester gas combustion)
- Ethanol Fermentation Processes (CO2)

EPA is currently researching and developing emission estimating procedures for these biogenic CO2 sources and will be making these available in the near future through EPA's website (www.epa.gov). Prior to these methods becoming available, sources will still be responsible for including these emissions for GHG permitting purposes and will need to propose methods for assessing and measuring these emissions that are adequate for all GHG permitting requirements. Permitting authorities will need to review these methods to determine their appropriate application for GHG permitting.

APPENDIX D

The Compliance Assurance Monitoring (CAM) Rule (40 CFR, Part 64) and Renewable Operating Permits

Stationary sources that are required to obtain an ROP may also be required to submit a CAM Plan with either their initial or renewal ROP application. Stationary sources may be subject to the CAM Rule if they are required to obtain an ROP and have an emission unit for which both of the following conditions are met:

- The emission unit uses a control device to achieve compliance with an 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 (considered to be major under the ROP Program) for the applicable pollutant.

The CAM Plan will generally be submitted with an ROP application on an AI-001 Form. A CAM Plan should be submitted for each pollutant-specific emission unit that is subject to the Rule. However, only one plan is needed if multiple emission units share the same control device for the regulated pollutant or if multiple control devices of similar design and operation for the regulated pollutant share the same emission unit. If periodic monitoring must be added to your existing ROP, you will have to propose the periodic monitoring on Part H of the application.

The general outline of a CAM Plan is:

- I. Background
- II. Monitoring approach
 - A. Indicators
 - B. Indicator Range
- III. Performance criteria
- IV. Justification

Additional information on CAM exemptions and CAM Plan preparation may be obtained on the Internet at: www.michigan.gov/air (select "Permits," "Renewable Operating Permits," "Background & Support Information," then "Compliance Assurance Monitoring"). Questions concerning CAM may be directed to Dennis Dunlap with the AQD at (269) 567-3553 or dunlapd@michigan.gov.

APPENDIX E
Air Quality Division District Office Contact Information

<p>Cadillac District - Air Quality Division (Northwest Lower Peninsula) 120 W Chapin Street Cadillac, MI 49601-2158 231-775-3960; Fax: 231-775-4050</p> <p><i>Counties: Benzie, Grand Traverse, Kalkaska, Lake, Leelanau, Manistee, Mason, Missaukee, Osceola, or Wexford</i></p>	<p>Gaylord District - Air Quality Division (Northeast Lower Peninsula) 2100 West M-32 Gaylord, MI 49735-9282 989-731-4920; Fax: 989-731-6181</p> <p><i>Counties: Alcona, Alpena, Antrim, Charlevoix, Cheboygan, Crawford, Emmet, Montmorency, Oscoda, Otsego, Presque Isle, or Roscommon</i></p>
<p>Grand Rapids District - Air Quality Division (Central West Michigan) 350 Ottawa Ave. NW Unit 10 Grand Rapids, MI 49503 616-356-0500; Fax: 616-356-0202</p> <p><i>Counties: Barry, Ionia, Kent, Mecosta, Montcalm, Muskegon, Newaygo, Oceana, or Ottawa</i></p>	<p>Jackson District - Air Quality Division (South Central Michigan) State Office Building, 4th Floor 301 E Louis B Glick Highway Jackson, MI 49201-1556 517-780-7690; Fax: 517-780-7855</p> <p><i>Counties: Hillsdale, Jackson, Lenawee, Monroe, or Washtenaw</i></p>
<p>Kalamazoo District - Air Quality Division (Southwest Michigan) 7953 Adobe Road Kalamazoo, MI 49009-5026 269-567-3500; Fax: 269-567-3555</p> <p><i>Counties: Allegan, Berrien, Branch, Calhoun, Cass, Kalamazoo St. Joseph, or Van Buren</i></p>	<p>Upper Peninsula District - Air Quality Division (Entire Upper Peninsula) 420 Fifth Street Gwinn, MI 49841-3004 906-346-8300; Fax: 906-346-4480</p>
<p>Saginaw Bay District - Air Quality Division (Central East Michigan) Saginaw Bay District Headquarters 503 N Euclid Avenue Bay City, MI 48706-2965 989-686-8025; Fax: 989-684-9799</p> <p><i>Counties: Arenac, Bay, Clare, Gladwin, Huron, Iosco, Isabella, Midland, Ogemaw, Saginaw, Sanilac, or Tuscola</i></p>	<p>Lansing District - Air Quality Division (Central Michigan) P.O. Box 30242 Constitution Hall, 525 W. Allegan St., 4N Lansing, MI 48909-7760 517-335-6010; Fax: 517-241-3571</p> <p><i>Counties: Clinton, Eaton, Genesee, Gratiot, Ingham, Lapeer, Livingston, or Shiawassee</i></p>
<p>Southeast Michigan District - Air Quality Division (Southeast Michigan) 27700 Donald Court Warren, MI 48092-2793 586-753-3700; Fax: 586-753-3731</p> <p><i>Counties: Macomb, Oakland, or St. Clair</i></p>	<p>Detroit Office (Wayne County) Cadillac Place, Suite 2-300 3058 West Grand Blvd. Detroit, MI 48202-6058 313-456-4700; Fax: 313-456-4692</p> <p><i>Counties: Wayne</i></p>