

ROP Initial Application Technical Review Procedures

Every ROP application needs to have a complete technical review conducted. This means that information that needs to be incorporated into the ROP from various sources is confirmed. In addition, close attention needs to be paid to new emission units, changes in existing emission units, new PTIs, new regulations, etc. This document will guide you through the technical review process for an initial ROP using the initial application forms. The technical review picks up where the administrative completeness determination ends. This document assumes that you are reviewing an administratively complete ROP application. You will be guided through each Form in the ROP application and advised on how to incorporate information from the application into the actual permit. As you develop the ROP, refer to specified guidance that is referenced in these procedures for additional details.

This document should be used in conjunction with the Staff Report Instructions. The staff report should include all significant regulations as well as history and enforcement actions related to the source.

NOTE: Where instructions indicate that you should **document your technical review in MACES**, this should be done via Compliance Activity (**ROP Tech Review Notes**). All of the review notes may be done in the same document.

I. Information to have on hand for the Initial ROP Application Technical Review

Note: You may not have all of this information for an initial review. Use what information you have at hand and the information provided by the company.

1. ROP Manual
2. Active Permits to Install (PTIs) issued to the company
 - a. ROP Look-up: This tool shows what PTIs have been issued and voided. This tool can be used to verify which PTIs need to be incorporated into the ROP.
3. Any management and work practice plans associated with the PTIs (i.e., MAP, Nuisance Minimization, Fug. Dust, O&M, PMP, SSM, etc.)
4. MACES activity reports (especially on-site inspections)
5. Consent Orders/Consent Judgments (note these may be State or Federal Consent Orders/Judgments)
 - a. Old Consent Orders – discuss any consent orders with company including if any should be terminated. The company is required to formally request termination
 - b. New Consent Orders –Reference the ROP Manual (4.I) and (4.K) for details on incorporating Consent orders and Permanent Federal Consent Decrees into the ROP.
6. Unresolved Violation Notices
7. Responses to Violation Notices
8. MAERS information for the source
9. AQD rules and regulations
10. Federal rules and regulations that apply to the source

Only management and work practice plans required as special conditions in the ROP need to be posted. Also, make note of these plans for posting separately from the ROP application.

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II. Developing the ROP and Verifying Technical Completeness

Follow the ROP Shell Instructions to create the Working Draft and save the draft in the designated folder on the District S drive along with the other saved documents. Staff will be required to incorporate all PTI's and applicable State and Federal Regulations into the ROP Shell to create the working draft.

1. Begin your review of the application. Enter conditions in the Working Draft ROP as you finish your review of each of the following Sections.
2. As your review of the application progresses, you should send a single letter or email to the company if additional information is needed for more than one issue. Use the template letter "ROP App Additional Info Letter." If possible, the entire application should be reviewed before a request for additional information is sent to avoid a piecemeal approach.
 - a. An email should be used only if there is a small amount of information being requested. Be sure to use the format of the "ROP App Additional Info Letter" for requesting the information.
3. Companies can submit additional information using the C-001 and AI-001 forms.

III. ASC-001 Form – Application Submittal and Certification

1. Compliance Statement
 - a. If any boxes have been checked "no" in the Compliance Statement area, conduct a thorough review of the AI-001 forms to determine if an adequate compliance plan and schedule of compliance has been submitted (see the "ROP Shell Instructions" in the ROP Manual (4.J) for guidance on what is required in a compliance plan and the schedule of compliance). Determine if a Violation Notice (VN) should be sent.
 - b. **Document your review in your ROP Technical Review notes** and include a request for any missing information in the additional information letter sent to the company. If the application indicates non-compliance, that was not previously identified, an additional site inspection may be warranted to evaluate the non-compliance issue, determine whether a VN should be sent, and evaluate whether the submitted compliance plan is adequate.
2. Confidential Information
 - a. If the applicant has indicated that the application contains confidential information, refer to AQD – 010 "Procedure for Handling of Confidential Materials & FOIA Requests for Confidential Materials" in the ROP Manual (8) (under EGLE Active Policies and Procedures, select "Air Quality Division").

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IV. SI-001 Form – Section Information

The Section Information Form SI-001 must be completed for all initial ROP applications that have more than one section. If the source has determined that the ROP should have more than one section, each section will need to have the appropriate forms included.

If the source has utilized the SI-001 Form to indicate multiple sections for their ROP, review the information and determine if there should be more than one section.

V. S-001 and S-002 Forms – Source, Contact and Responsible Official Information

1. Source Information
 - a. Verify that the NAICS Code is correct for the source. Compare to the NAICS Code listed in MAERS and MACES.
 - b. Verify the source address provided in the application.
2. Owner Information
 - a. Compare the owner name with that in MACES and MAERS and any PTIs issued to the source.
3. Contact and Responsible Official Information
 - a. Verify that information for at least one contact and one Responsible Official has been provided in the application. Also verify that the Responsible Official meets the requirements for a Responsible Official in Rule 118(j).
4. Additional Information
 - a. If the box is checked that an AI-001 form is provided for additional information for either the S-001 or S-002 Form, verify that the AI-001 form is included in the application and review the information.

VI. S-003 Form – Source Requirement Information

This form requires the source to indicate if it is subject to one or more specific regulations and to include any additional information. Review the source's answers, and document in your technical review notes, so it is clear that these areas have been addressed in regard to the regulations. Provide as much information in the staff report as necessary to convey relevant information to someone who has no background on the facility. For example, if the facility has never been subject to CSAPR/Acid Rain, the information provided in the staff report may be as short as simply indicating that it is not applicable. Be sure to include details such as geographic location, and process related information. ***Review each requirement and document your review in your ROP Technical Review notes.***

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1. MAERS: ALL emission units at an ROP source that are included in the ROP must report emissions to MAERS. If emissions were not reported to MAERS (check the most recently reported MAERS), the MAERS activity and emission forms must be included with the ROP application. If these forms were not included with the application but should have been, include a request for the forms in the additional information letter sent to the company. NOTE – since this is an initial ROP, the company may not have reported to MAERS yet.
2. Federal ozone-depleting substances program: 40 CFR Part 82 has not been delegated to the State. However, since the permit is a federally-enforceable permit, the company must state whether or not it is subject to these requirements. If the company is subject to Part 82, you do not have to incorporate specific requirements into the ROP. Part 82 requirements are referenced in the ROP General Conditions.
3. Federal Chemical Accident Prevention Provisions – Section 112(r): Verify if the source operates an emission unit that is subject to Section 112(r) of the Clean Air Act (40 CFR Part 68). If the source is subject to Section 112(r), you do not have to incorporate specific requirements into the ROP. Section 112(r) requirements are referenced in the ROP General Conditions.
4. Does the source belong to one of the source categories that require quantification of fugitive emissions? See Rule 116(n) for a list of the source categories. If yes, the category should be listed on an AI-001 Form and the fugitive emissions should be included in any PTE provided.
5. PTE – Criteria Pollutants: Has the source previously submitted a potential to emit (PTE) demonstration for criteria pollutants (CO, NO_x, PM₁₀, PM_{2.5}, SO₂, VOC, lead) emissions that is still accurate? If no, ensure the source has included the potential and emission calculations for each pollutant on an AI-001 Form. If yes, be sure the applicant included the PTI or ROP application numbers or other references for the submitted demonstrations on an AI-form. Make sure these references are correct and no emission units have been modified or missed. Also make sure that the EPA class and pollutants that are marked as major are accurate on the MACES Regulatory Summary Screen. Include this information in your technical review notes and in the staff report.
6. PTE – Has the source previously submitted a PTE demonstration for Hazardous Air Pollutants (HAPs) regulated by Section 112 of the Federal Clean Air Act that is still accurate? If no, ensure the source has included the potential and emission calculations for identified each pollutant on an AI-001 Form. If yes, be sure the applicant included the PTI or ROP application numbers or other references for the submitted demonstrations on an AI-form. Make sure these references are correct and no emission units have been modified or missed. Also make sure that the EPA class and pollutants that are marked as major are accurate on the MACES Regulatory Summary Screen. Include this information in your technical review notes and in the staff report.
7. If the source indicates that there are emission units subject to CAM, review the list of emission units and pollutants the source has listed as being subject to CAM, on their

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attached AI-001 Form. Make sure the list is complete by reviewing ALL emission units for CAM applicability to ensure that all CAM subject emission units (and all subject pollutants) have a CAM Plan submitted with the application.

- a. Review the CAM Plan submitted with the ROP application to ensure that it is complete and meets the minimum requirements specified in 40 CFR Part 64. Refer to the “CAM Guidance” in the ROP Manual (4.F) for procedures for reviewing and incorporating CAM Plans into the Working Draft ROP.
 - b. If a CAM Plan is required for an emission unit but was not included in the ROP application, request the submittal of the required CAM Plan for that emission unit in the additional information letter to the company.
 - c. If the company indicated that there is Presumptively Acceptable Monitoring (PAM), refer to the “CAM Fact Sheet” in the ROP Manual (4.F.2) for guidance on how to evaluate PAM.
 - d. The CAM Plan and all CAM conditions in the ROP must be reviewed by the CAM specialist.
8. Does the source have any active Consent Orders/Consent Judgments (CO/CJ)? If yes, be sure the CO/CJ is attached.
9. CSAPR: If the source is subject to CSAPR, the source should identify the emission unit(s) subject on an AI-001 Form. Provide the information to the Acid Rain Specialist (**Brian Carley**) for review and coordination in incorporating these requirements into the ROP.
10. Acid Rain: If the source is subject to the Acid Rain Program, check with the Acid Rain Specialist (**Brian Carley**) to ensure he received a copy of the Acid Rain permit application. Coordinate with him on the issuance of the permit. Refer to the “Procedures for Issuance of Non-ROP Renewable Permits (Acid Rain) and Incorporation into ROPs” in the ROP Manual (5.E).
11. Required management and work practice plans: If the source indicates that they have required plans, verify that the plans are included with the application and review them for the following information:
- a. Ensure that each plan is the most recent approved version and review any submitted plans to ensure all requirements have been appropriately addressed.
 - b. Ensure that any recent changes in equipment or operational scenarios have been addressed in the plan. If any updates are needed, include the specifics in the additional information letter to the company. If the source does not indicate that plans are required, check your resource materials (see Section I – Information to have on hand for ROP Application Technical Review) to see if the source should have included plans that we are aware of. If so, include a request for those plans in the additional information letter sent to the company. **Make sure that any special conditions requiring the plan are in the ROP.**
12. Non-Applicable Requirements: If the source indicates that specific requirements or regulations are not applicable, be sure the company has included a justification.
- a. Review each justification and document the decision as to any agreed upon non-applicable requirement or why something is not agreed upon.

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Additional Information: If the box is checked indicating that an AI-001 Form is attached for additional information for the S-003 Form, verify that the AI-001 Form is included in the application and review the information.

NOTE: Document any applicability or non-applicability of the above in your ROP Technical Review notes and in the staff report.

VII. EU-001 Form – PTI Exempt Emission Units

This form is used to identify emission units that are exempt from PTI requirements and are not required to be included in the final ROP pursuant to Rule 212(4). Emission units identified here should not be subject to any process specific emission limitations (e.g. Rule 331, NSPS, MACT, NESHAP, etc.).

1. Review each PTI exempt emission unit listed on the EU-001 Form for the following **and document your review in your ROP Technical Review notes**:
 - a. Verify that the listed Rule 201 exemption applies to the emission unit.
 - b. Verify that the Rule 201 exemption is one of the rules listed under Rule 212(4).
 - c. Determine if the emission unit is subject to a process specific emission limitation or standard (e.g. Rule 331, NSPS, MACT, NESHAP, etc.). Use the “Rule 212 Support Tables” in the ROP Manual (3.B).
2. Depending on the results of your review, one of the following actions will be taken (and **documented in your ROP Technical Review notes**):
 - a. If the emission unit is exempt from PTI requirements and is listed in Rule 212(2) or Rule 212(3), then do not include it in the draft ROP Staff Report.
 - b. If the emission unit is exempt from PTI requirements and is listed in Rule 212(4), and is not subject to a process specific emission limitation, identify it in the Exempt Emission Unit Table in the draft ROP Staff Report.
 - c. If the emission unit is exempt from PTI requirements and is listed in Rule 212(4) but is subject to a process specific emission limitation or standard (e.g. Rule 331, NSPS, MACT, NESHAP, etc.), then include a request for the appropriate ROP application forms to be submitted for the emission unit in the additional information letter sent to the company. This emission unit is not an ROP-exempt emission unit and needs to be included in the ROP.
3. This form should include any exempt emission unit that does not have any applicable requirements or limits. Any emission units that do have applicable requirements or limits need to be included on Forms EU-002 or EU-003.

VIII. EU-002 Form – Emission Units Meeting the Criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290

This form is used to identify emission units that meet the criteria of Rule 281(2)(h), Rule 285(2)(r)(iv), Rule 287(2)(c), or Rule 290. Although these emission units are otherwise not required to be included in the ROP pursuant to Rule 212(4), they must be included in the final

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ROP because they are subject to process-specific emission limitations or standards. To ensure consistency in adding the applicable requirements, templates were created to provide standardized conditions for these specific Rules.

1. Review each emission unit listed on the EU-002 Form for the following ***and document your review in your ROP Technical Review notes:***
 - a. Determine if the emission unit identified truly meets the requirements of the rule identified.
 - b. Verify whether or not the emission unit is in compliance. This can be done by requesting records from the company or by reviewing recent AQD inspection reports.
 - i. If the emission unit is not in compliance, a violation notice and/or consent order should be in the file, a compliance plan should be included in the ROP application (if the source expects to not be in compliance at the time of ROP issuance), or a violation notice should be sent to the source if the non-compliance has not been addressed.
 - ii. If a compliance plan was required but was not submitted, include a request for a written compliance plan in the additional information letter or email to the company.
 - c. Verify whether or not emissions from this emission unit were reported to MAERS.
 - i. If emissions were reported in MAERS, use the information to help determine if the emission unit is in compliance with the Rule.
 - ii. If emissions were not reported in MAERS, the MAERS activity and emission forms must be included in the ROP application. If these forms were not included, include a request that the forms be submitted in the additional information letter to the company. Once the forms have been submitted, be sure to enter the information into MAERS.
2. For each emission unit or group of emission units included on the EU-002 Form, enter the Emission Unit ID in the Emission Unit Summary Table in the Working Draft ROP. Also enter the Flexible Group ID in the Flexible Group Summary Table of the Working Draft ROP.
3. Incorporate the standardized template requirements for each rule identified on the EU-002 Form into the Working Draft ROP (using the ROP Toolbar).

IX. EU-003 Form – Emission Units with Permits to Install

1. Review each emission unit listed on the EU-003 Form for the following ***and document your review in your ROP Technical Review notes:***
 - a. Check to see that the emission unit is included in MAERS. If it isn't, add it to MAERS with the same information contained in the PTI.
 - b. If the emission unit is in operation and emissions haven't been reported to MAERS, MAERS activity and emission forms must be included in the ROP application. If these forms were not included, include a request that the forms be submitted in the additional information letter to the company.
 - c. Add the emission unit ID and description to the Emission Unit Summary Table in the Working Draft ROP.

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- d. Verify the emission unit has been constructed and add the constructed date to the Emission Unit Summary Table.
2. If the source is proposing any administrative changes to emission unit names or descriptions, or control devices from the current PTI listed on this form, review the proposed changes and if acceptable, make sure that the changes are reflected in MAERS.
3. If the source is proposing clarification to any conditions in the PTI, review the proposed changes to ensure that the intent of the condition has not been changed, that it is not less stringent, and/or that the change does not require New Source Review.
4. If the source is proposing to add any monitoring, testing, recordkeeping or reporting to demonstrate compliance with any applicable requirements in the PTI, review the proposed conditions to determine if they should be added to the ROP. Review the PTI yourself for any monitoring, testing, recordkeeping or reporting conditions that should be added to demonstrate compliance and the conditions are enforceable.
5. For each PTI listed on this form, enter the PTI number, description, and the emission unit(s) it pertains to in Appendix 6 of the Working Draft ROP.
6. Develop an EU and/or FG Table for each PTI and incorporate all conditions into the table.

X. EU-004 Form – Other Emission Units

This form is used to identify emission units that have not been addressed on the previous EU forms, including EUs that are grandfathered or exempt from requirements to obtain a PTI but have applicable requirements.

1. Review each emission unit listed on the EU-004 Form for the following ***and document your review in your ROP Tech Review notes:***
 - a. Check to see that the emission unit is included in MAERS. If it isn't, add it to MAERS with the same information listed on the form.
 - b. If the emission unit is in operation and emissions haven't been reported to MAERS, MAERS activity and emission forms must be included in the ROP application. If these forms were not included, include a request that the forms be submitted in the additional information letter to the company.
 - c. Add the emission unit ID, description and installation/modification dates to the Emission Unit Summary Table in the Working Draft ROP (if it isn't already included).
 - d. Verify the emission unit has been constructed and add the constructed date to the Emission Unit Summary Table.
 - e. Verify that an AR-001 or AR-002 Form has been completed for each emission unit listed on this form.
2. Develop an EU and/or FG Table for each emission unit if one does not already exist.
3. Review ALL emission units at the source for any applicable MACT, NESHAP or NSPS regulations or applicable State rules that have not already been identified on the EU-004 Form or in a PTI.

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XI. FG-001 Form – Flexible Groups

If the source used this form to create flexible groups, review the groupings to determine that the emission units share regulations and/or applicable requirements that make sense to combine the emission units into a flexible group. Make sure all emission units listed on the flexible group form are also listed on either an EU-003 or EU-004 Form. If the source did not create any flexible groups, but you see an opportunity to group emission units with like regulations and/or applicable requirements, you may propose them to the source. **Document any flexible groups proposed by either the source or you in your ROP Tech Review notes.**

XII. AR-001 Form – Applicable Requirements from MACT, NESHAP or NSPS

For each emission unit identified on the EU-004 Form as being subject to the requirements of a MACT, NESHAP or NSPS, an AR-001 Form should be completed identifying the applicable requirements that apply to the emission unit. In addition, any emission unit listed on the EU-003 Form subject to the requirements of a MACT, NESHAP or NSPS should also be listed on the AR-001 Form.

1. Review each emission unit listed on the AR-001 Form for the following **and document your review in your ROP Tech Review notes:**
 - a. Review the emission unit description on the EU-003 or EU-004 Form for each emission unit listed to ensure that the emission unit is subject to the listed federal regulation.
 - b. If the emission unit listed on the EU-003 Form indicates that the applicable requirements for the listed MACT, NESHAP or NSPS are included in a PTI, review the PTI to ensure that the listed regulation is indeed included in detail in the PTI for that emission unit. If only a high-level citation is included in the PTI, the source should have submitted the details of the federal requirement in a newly created table or a template table (if one exists). If the company did not provide this table, include a request for the company to submit the table in the additional information letter.
 - c. If the emission unit listed indicates that the applicable requirements for the listed MACT, NESHAP or NSPS are included in a template table, review the table to ensure that it is the correct table for the listed regulation and the identified emission unit(s).
 - d. If the emission unit listed indicates that the applicable requirements for the listed MACT, NESHAP or NSPS are included in a newly created table, review the table to ensure that the regulation is incorporated correctly and completely in the table for the identified emission unit(s).
 - e. Incorporate the table(s) into the Working Draft ROP.
2. If the source proposes to streamline any conditions, review their justification to determine if it makes sense. Use the “Staff Guidance on Streamlined/Subsumed Requirements in ROPs” in the ROP Manual (4.G). If you see any conditions that should be streamlined, **provide a justification in your ROP Tech Review Notes. Discuss any streamlined requirements in the staff report.**

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XIII. AR-002 Form – Other Applicable Requirements

The AR-002 Form is used to identify applicable requirements from state rules, consent orders/consent judgments, or federal regulations (other than those from a MACT, NESHAP or NSPS, which are included on the AR-001 Form) for emission units listed on the EU-004 Form.

A separate AR-002 Form should be used for each emission unit listed on the EU-004 Form and its applicable requirements as listed above.

1. Review the applicable requirements listed on the AR-002 Form and the proposed permit conditions in the associated emission unit table for the following ***and document your review in your ROP Tech Review notes:***
 - a. Determine if the applicable requirements listed by the source apply to the emission unit, and all applicable requirements that apply to the listed emission unit are included on the AR-002 Form. Refer to “Identifying Underlying Applicable Requirements” in the ROP Manual (3.A). Every effort should be made to identify all underlying applicable requirements (UARs). This includes all state rules and federal regulations.
 - b. Review the emission unit table created by the source to incorporate the applicable requirements into proposed ROP conditions. Carefully read each proposed permit condition and make sure that it correctly conveys the applicable requirement and is practically enforceable. It may be necessary to rewrite or reword a proposed condition to make it more practically enforceable.
 - c. Add permit conditions to the emission unit table for any additional UARs discovered during review of the AR-002 Form in a. above.
 - d. If the source has an active consent order or consent judgment, you need to review the order/judgment and refer to the “Procedure for Identifying and Incorporating Applicable Requirements from Existing Consent Orders and Judgments into Renewable Operating Permits” in the ROP Manual (4.I) and to the procedure for “Incorporating Permanent Federal Consent Decree Requirements into ROPs” in the ROP Manual (4.K) for how to properly identify the applicable requirements in the order/judgment and properly incorporate them into the ROP. ***Include a discussion of the consent order/consent judgment in the staff report.***
 - e. Review each limit and restriction to ensure that there is a method to determine compliance with the limit or restriction. This can be testing, monitoring and/or recordkeeping. Refer to the “Periodic Monitoring Guidance” in the ROP Manual (4.E). Every limit or restriction must have at least one enforceable requirement that is used to demonstrate compliance.
 - f. Incorporate the table(s) into the Working Draft ROP.
2. If the source proposes to streamline any conditions, review their justification to determine if it makes sense. Use the “Staff Guidance on Streamlined/Subsumed Requirements in ROPs” in the ROP Manual (4.G). If you see any conditions that should be streamlined, ***provide a justification in your ROP Tech Review Notes. Discuss any streamlined requirements in the staff report.***

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XIV. AR-003 Form – Source-Wide Applicable Requirements

The AR-003 Form is used to identify any applicable requirements that apply to the entire source. An example would be a synthetic minor Hazardous Air Pollutant (HAP) emission limit and associated recordkeeping that applies to the entire stationary source.

1. Review the applicable requirements listed on the AR-003 Form and the proposed permit conditions in the associated Source-Wide Table for the following ***and document your review in your ROP Tech Review notes:***
 - a. Determine if the applicable requirements listed by the source apply to the entire source.
 - b. Review the Source-Wide Table created by the source to incorporate the applicable requirements into proposed ROP conditions. Carefully read each proposed permit condition and make sure that it correctly conveys the applicable requirement and is practically enforceable. It may be necessary to rewrite or reword a proposed condition to make it more practically enforceable.
 - c. If the source has an active consent order or consent judgment that has requirements that apply to the entire source, you need to review the order/judgment and refer to the “Procedure for Identifying and Incorporating Applicable Requirements from Existing Consent Orders and Judgments into Renewable Operating Permits” in the ROP Manual (4.I) and to the procedure for “Incorporating Permanent Federal Consent Decree Requirements into ROPs” in the ROP Manual (4.K) for how to properly identify the applicable requirements in the order/judgment and properly incorporate them into the ROP. ***Include a discussion of the consent order/consent judgment in the staff report.***
 - d. Review each limit and restriction to ensure that there is a method to determine compliance with the limit or restriction. This can be testing, monitoring and/or recordkeeping. Every limit or restriction must have at least one enforceable requirement that is used to demonstrate compliance. Refer to the “Periodic Monitoring Guidance” in the ROP Manual (4.E) for additional details on how to incorporate additional testing/monitoring/recordkeeping requirements using Rule 213(3). NOTE – sufficient monitoring/recordkeeping is required for all emission units and flexible groups. Incorporate any additional requirements as necessary ensuring practical enforceability.
 - e. Incorporate the table into the Working Draft ROP.

XV. Compliance Plans (Appendix 2)

1. If the application indicates that the source is not in compliance with all of its applicable requirements in its PTIs, the source must identify the specific requirements for which it is out of compliance. The source should also include a plan and schedule for coming back into compliance.
 - a. The non-compliance issues should be reviewed, along with the plan and schedule for coming back into compliance to determine if it is acceptable.
 - b. Refer to “Completing a Schedule of Compliance in Appendix 2 of an ROP” in the ROP Manual (4.J). This guidance will assist you in properly incorporating a source’s compliance plan and schedule for coming back into compliance into Appendix 2 in an enforceable manner.

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- c. If the AQD was not previously aware of the non-compliance issue(s), the PTIs, consent orders/judgments, or other documents should be reviewed to determine if escalated enforcement is warranted. Work with enforcement staff to determine the appropriate course of action.

XVI. Review of the Working Draft ROP

After completing all of the previous steps, it is important to review the entire Working Draft ROP after all of the applicable requirements from all PTIs, state rules, consent orders, federal regulations, and any references to management and work practice plans submitted have been added into the appropriate sections.

1. Begin with reviewing the Source-Wide Table. Ensure that the applicable requirements in the application have been included in the Working Draft ROP.
 - a. Note: All information that is/was contained in the FGFACILITY table in a PTI should be included in the Source-Wide Table in the ROP.
2. Next, review the Emission Unit Summary Table and make sure all emission units in the Working Draft ROP are listed in the table. Check that any flexible groups listed are correct for each emission unit. Do the same review on the Flexible Group Summary Table. Confirm, based on your knowledge of the source, that all EUs/FGs are included in the Working Draft ROP.
 - a. Review every emission unit and compare each to the PTIs, consent orders/judgments, AQD Rules, federal regulations and the AR Forms to be sure that all applicable requirements have been addressed.
 - b. Review the EU-002 Form to make sure that the appropriate flexible group tables for Rule 287(2)(c), Rule 290, Rule 285(2)(r)(iv) or Rule 281(2)(h) are included in the Working Draft ROP.
3. For EACH emission unit, review the description, control equipment, and any flexible groups listed at the top of the table to ensure that the correct information is listed.
4. Review the emission limits and material limits. Look at the method of compliance and determine if it accurately demonstrates compliance with the limit. General Condition 13 should not be used as the only method of compliance for an emission limit (and should be avoided if possible).
5. Review the rest of the categories in the emission unit table. Make sure that all monitoring equipment is required to be installed (Design/Equipment), as well as the requirement to operate the equipment (Process/Operational) and at what interval monitoring should occur and any recordkeeping is also included (Monitoring/Recordkeeping).
6. Adequate Testing, Monitoring and Recordkeeping: Refer to the "Periodic Monitoring Guidance" in the ROP Manual (4.E). Every limit or restriction must have at least one enforceable requirement that is used to demonstrate compliance.

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7. Take a close look at the wording of ALL conditions. Carefully read the requirement and make sure that it is practically enforceable. It may be necessary to rewrite or reword a requirement to make it more practically enforceable. Note – some items cannot be changed through the ROP process and may only be changed via a new PTI. Discuss changes with your supervisor, where appropriate.
8. Check for any management and work practice plans referenced in the ROP and review those plans to ensure they have been reviewed by the company, are updated as necessary and are ready for public comment. **Be sure that all plans adequately address all requirements and have all the pertinent information for each emission unit.**
9. Review the UARs on all conditions to make sure they are accurate. Are there additional UARs that should be added? Refer to the “Identifying Underlying Applicable Requirements” guidance in the ROP Manual (3.A). Every effort should be made to identify all UARs. This includes all state rules and federal regulations.
10. Streamlined Requirements: In cases where there is more than one underlying applicable requirement, it could be possible to streamline requirements by subsuming less stringent requirements under the most stringent requirement. **EXAMPLE:** If Rule 301 limits opacity to 20% and the NSPS limits opacity to 10%, then compliance with Rule 301 is assured through compliance with the NSPS limit. Therefore, the Rule 301 limit is subsumed under the NSPS limit. Both UARs must be identified and a footnote with the language for streamlined requirements must be added to the requirement. See the “Staff Guidance on Streamlined/Subsumed Requirements in ROPs” in the ROP Manual (4.G) for more detailed instructions on how to incorporate such requirements into the Working Draft ROP.
11. Review the emission units and determine if there are any additional requirements such as State Rules and Federal Standards (NSPS or MACTS) that have not been addressed. Incorporate any additional requirements, as necessary.
12. Review any emission units with control to confirm whether they are subject to CAM. If they are, ensure that all applicable CAM conditions are included. Refer to “Incorporating a CAM Plan into an ROP” in the ROP Manual (4.F.6). Make sure the CAM Specialist reviews all CAM conditions.
13. Review each Appendix to ensure that all information that should be listed is included, that it is accurate, and that the appropriate emission unit or flexible group that it applies to is identified. Also make sure that the emission unit or flexible group table has the appropriate Appendix or Appendices referenced. If an appendix is not being used for that emission unit, remove the reference to it from the emission unit table. For Appendix 6, ensure that all active PTIs that will be incorporated into the source’s ROP are listed here.

Make sure your entire technical review has been documented in your ROP Tech Review notes.

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XVII. Completing the Staff Report

Create the staff report as outlined in the ROP Staff Report procedures. Additional instructions for completing the Staff report can be found in the ROP Manual (4.B.1). Please note: It may be helpful to complete the staff report in parallel or in conjunction with the technical review.

Note: All major changes noted in the technical review also need to be documented in the staff report, along with a history of any changes at the source, and a discussion of all applicable regulations and those regulations that may be expected to apply to the source, but do not.