

PROCEDURE TO VOID AN ISSUED ROP

Voiding an ROP (no Source-Wide PTI Required)

After an ROP is issued, a source may request to void the ROP if no longer subject to the ROP program. If the ROP includes a Source-Wide PTI, equipment at the source was subject to Rule 201. With ROP issuance, any PTIs for equipment subject to Rule 201 were re-issued as a Source-Wide PTI. If the Source-Wide PTI needs to remain active, go to the “Voiding an ROP Where the Source-Wide PTI Remains Active” procedure on page 3. It may be appropriate to void an ROP that includes a Source-Wide PTI under certain circumstances including the following:

- A source has been *issued* an opt-out permit that covers all equipment source-wide subject to Rule 201;
- A source is permanently shut down;
- A source has moved to a new location; or
- A source becomes a true minor with only Rule 201 exempt equipment.

If voiding an ROP that includes a Source-Wide PTI, and the Source-Wide PTI is also to be voided, use the procedure below. If the ROP does not include a Source-Wide PTI, use the procedure below.

Procedure

1. A letter must be submitted to the District Supervisor under signature of the Responsible Official(s) requesting that the source’s ROP be voided. This letter should include the name, location and SRN of the source, the permit number, and the reason for voiding the ROP and Source-Wide PTI (if the ROP includes a Source-Wide PTI).
2. District staff reviews the request and determines if the ROP and Source-Wide PTI can be voided. Discuss with the supervisor if the void request is not approvable.
3. Prepare the void letter using **ROP Void Permit Letter.dot**. The response letter is to be addressed to the Responsible Official(s) and signed by the District Supervisor. Both the void approval and denial options are in the one template.
 - a. If approvable, grant the void request. If the source has any outstanding ROP applications (renewal or modifications), these should be voided. Both the ROP and any Source-Wide PTI should be voided. Save the letter as **SRN Void Permit Letter.docx**. EPA, the Field Operations Manager, Kelly Orent (Field Section) and Sue Thelen (Permit Section) are e-mail copied.
 - b. If the void request is not approvable, deny the void request with an explanation as to the reason for denial. Save the letter as **SRN Void Permit Denied Letter.docx**.

MACES

4. Enter the date the ROP was voided in MACES under the “Compliance” Tab, “ROP.” On the ROP Screen, make sure you are in the facility you want to be in, click on the correct App No. to the left of the screen. Then click on the “Events” Tab, fill in the event type in the pop-up window (Permit – Permit Void Date), and enter the void date. Add information in the comment area to explain why the ROP is being voided. Add if a Source-Wide PTI was voided and why, or that no Source-Wide PTI existed. Click on any approved modifications

associated with the ROP being voided and any outstanding applications (renewal or modification). Add the void event (with comment that the ROP was voided) to each of them.

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5. Finalize and send the void letter to the Responsible Official(s).
6. Email a copy of the void letter to EPA, the Field Operations Manager, Kelly Orent (Field Section) and Sue Thelen (Permit Section).
7. Insert "VOID" at the top of the ROP and insert "Void Date: {Spell out date; e.g., January 1, 2018}" under the expiration date on the cover sheet. Save the electronic voided ROP as **SRN Void {date}.docx** and archive according to the district procedure for archiving old ROPs.
8. File the void request letter and the void approval letter in the yellow ROP file folder that indicates VOID with the void date on the file label.
9. Notify the FITT representative to remove the SRN folder (containing the ROP and staff report) from the ftp site.

Voiding an ROP Where the Source-Wide PTI Remains Active

After an ROP is issued, a source may request to void the ROP if no longer subject to the ROP program. However, the Source-Wide PTI may need to remain active because the PTI terms and conditions remain in effect unless the criteria of Rule 201(6)(a) or (c) are met.

Procedure

1. A letter must be submitted to the District Supervisor under signature of the Responsible Official(s) requesting that the source's ROP be voided. This letter should include the name, location and SRN of the source, the permit number, and the reason for voiding the ROP and why the Source-Wide PTI is still required.
2. Notify the Field Operations Manager of the request to void an ROP where a Source-Wide PTI is still required. Staff assignment for processing the request shall be made by the Field Operations Manager.
3. The assigned staff reviews the request and determines if the ROP can be voided, and if a Source-Wide PTI needs to remain active. (*Note: If the source recently was issued an opt-out PTI that covers all equipment subject to Rule 201 at the source, the Source-Wide PTI can be voided with the ROP void. Use the procedure "Voiding an ROP (no Source-Wide PTI Required)."*) Discuss with management if the void request is not approvable and if denying request, jump to step 5.b. below.
4. For approvable requests, assigned staff will prepare the Source-Wide PTI according to the procedure "*creating a stand-alone Source-Wide PTI*" below (Page 4).
5. After the Source-Wide PTI is completed (Page 4, Steps 1-6), prepare the void letter using **ROP Void Permit Letter.dot**. The response letter is to be addressed to the Responsible Official(s) and signed by the District Supervisor. Both the void approval and denial options are in the one template.
 - a. If approvable, grant the void request. If the source has any outstanding ROP applications (renewal or modifications), these should be voided. The Source-Wide PTI will be sent with the letter. Save the letter as **SRN Void Permit Letter.docx**. EPA, the Field Operations Manager, the Permit Section Manager, Kelly Orent (Field Section) and Sue Thelen (Permit Section) are e-mail copied on this letter.
 - b. If the void request is not approvable, deny the void request with an explanation as to the reason for denial. Save the letter as **SRN Void Permit Denied Letter.docx**.
6. Send the electronic documents for the accepted draft Source-Wide PTI conditions, technical review notes, and draft void approval letter to the District Secretary to finalize and for the file.

MACES

7. Enter the date the ROP was voided in MACES under the "Compliance" Tab, "ROP." On the ROP Screen, click on the "Events" Tab, fill in the event type in the pop-up window (Permit – Permit Void Date), and enter the void date. Add information in the comment area to explain why the ROP is being voided, that the Source-Wide PTI is still required and why, and the Source-Wide PTI number. Click on any approved modifications associated with the ROP being voided and any outstanding applications (renewal or modification). Add the void event (with comment that the ROP was voided) to each of them.

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8. Finalize and send the void approval letter and Source-Wide PTI to the Responsible Official(s).
9. Email a copy of the void approval letter to EPA, the Field Operations Manager, the Permit Section Manager, Kelly Orent (Field Section) and Sue Thelen (Permit Section).
10. Send the following documents to Sue Thelen (Permit Section) to enter the Source-Wide PTI into Permit Cards and permit databases.
 - a. PDF of the letter from the Responsible Official(s) requesting the ROP void.
 - b. PDF of the SRN void approval letter from AQD to the Responsible Official(s).
 - c. The Word documents for the Source-Wide PTI and technical review notes.
11. Insert "ROP VOID" at the top of the ROP and insert "ROP Void Date: {Spell out date; e.g., January 1, 2018}" under the expiration date on the cover sheet. Save the electronic voided ROP as **SRN Void {date}.docx** and archive according to the district procedure for archiving old ROPs.. (This step should not be done until now as there may be issues in developing the Source-Wide PTI that may make it unapprovable.)
12. File the void request letter in the yellow ROP file folder that indicates VOID with the void date on the file label.
13. File the Source-Wide PTI, technical review notes, and void approval letter to the Responsible Official in the blue file folder.
14. Notify the FITT representative to remove the SRN folder (containing the ROP and staff report) from the ftp site.

Creating a Stand-Alone Source-Wide PTI

When an ROP is voided and the Source-Wide PTI is still required, the conditions in the Source-Wide PTI (which are conditions from previously issued PTIs) must be separated from the ROP. This will require removal of all ROP references and ROP only conditions from the permit to create the stand-alone Source-Wide PTI. If the ROP has more than one section, discuss with management how to handle. *If during the processing, it is discovered that the stand-alone Source-Wide PTI will be un-enforceable because it is missing emission limits and standards, operational requirements and limits, sufficient testing, monitoring, recordkeeping, reporting, and compliance evaluation activities, discuss with management.*

Draft Source-Wide PTI:

1. Save a copy of the ROP in effect under the Source-Wide PTI number (e.g., MI-PTI-A1234-2018). The Source-Wide PTI number and effective date will remain the same as this is not a re-issuance of the Source-Wide PTI.
 - a. On the certificate cover page, remove the "RENEWABLE OPERATING PERMIT" box. In the "SOURCE-WIDE PERMIT TO INSTALL" box, make sure that Section 5505(1) of Act 451 is cited in the first sentence.
 - b. For all permit headers, remove the ROP No. and Expiration Date leaving the Source-Wide PTI No.
 - c. Remove the AUTHORITY AND ENFORCEABILITY page.
2. A. GENERAL CONDITIONS:
 - a. Any general conditions (GCs) specific to the ROP program must be removed leaving GCs 9, 11, 12, 13, 25 and 43 to 46. In addition, an ROP reference must be removed from the beginning of GC 11 and a Responsible Official reference removed from the end of GC 25. The remaining nine (9) conditions should be renumbered appropriately.

3. B. SOURCE-WIDE CONDITIONS:
 - a. Remove any references to the ROP (e.g., 1st paragraph, 2nd sentence “and any other terms and conditions contained in this ROP”).
 - b. Remove any conditions that were added per Rule 213. These conditions should have no footnote 1 or 2.
 - c. If the special conditions were moved from a PTI flexible group, such as FGFACILITY, these should all have the footnote 1 or 2. **Check the original PTI to make sure the special condition language is accurate, correct, and matches the intent of the original PTI.** (The original PTI conditions can stay in the B. SOURCE-WIDE CONDITIONS.)

4. C. EMISSION UNIT CONDITIONS:
 - a. Remove any references to the ROP (e.g., 1st paragraph, 2nd sentence “and any other terms and conditions contained in this ROP”).
 - b. In the EMISSION UNIT SUMMARY TABLE, remove any emission units that are Rule 201 exempt.
 - d. Remove any conditions that were added per Rule 213. These conditions should have no footnote 1 or 2.
 - c. Review all emission unit conditions to make sure the special condition language came from a PTI. **Check the original PTI to make sure the special condition language is accurate, correct, and matches the intent of the original PTI.** Typos and mistakes can be corrected. Any streamlined/subsumed requirements will need to be removed (and any footnotes to that effect), and the special condition returned to the language that was in the original PTI.
 - d. If records were required to be maintained on file for a period of five years in the original PTI, keep “Records shall be maintained on file for a period of five years.” in Sections V and VI. Change the applicable requirement back to R 336.1201(3). If records were not required to be kept for five years, then remove the sentence.
 - e. If testing condition language was substantially modified or removed, the special condition from the original PTI needs to be returned.
 - f. If the monitoring/recordkeeping condition language was substantially modified or removed, the special condition from the original PTI needs to be returned.
 - g. All CAM conditions and applicable requirements will need to be removed. If CAM requirements were added to a condition with a footnote 2, return the special condition to the language that was in the original PTI.

5. D. FLEXIBLE GROUP CONDITIONS:
 - a. Remove any references to the ROP (e.g., 1st paragraph, 2nd sentence “and any other terms and conditions contained in this ROP”).
 - b. In the FLEXIBLE GROUP SUMMARY TABLE, remove any flexible groups that did not come from a PTI.
 - e. Remove any conditions that were added per Rule 213. These conditions should have no footnote 1 or 2.
 - c. Review all emission unit conditions to make sure the special condition language came from a PTI. **Check the original PTI to make sure the special condition language is accurate, correct, and matches the intent of the original PTI.** Typos and mistakes can be corrected. Any ROP streamlined/subsumed requirements will need to be removed (and any footnotes to that effect), and the special condition returned to the language that was in the original PTI.

- d. If records were required to be maintained on file for a period of five years in the original PTI, keep "Records shall be maintained on file for a period of five years." in Sections V and VI. Change the applicable requirement back to R 336.1201(3). If records were not required to be kept for five years, then remove the sentence.
- e. If any testing condition language was substantially modified or removed, the special conditions from the original PTI needs to be returned.
- f. If any monitoring/recordkeeping condition language was substantially modified or removed, the special conditions from the original PTI needs to be returned.
- g. All CAM conditions and applicable requirements will need to be removed. If CAM requirements were added to a condition with a footnote 2, return the special condition to the language that was in the original PTI.

6. Appendices:

- a. Keep Appendix 1. Abbreviations and Acronyms
- b. Remove all appendices that did not come from a PTI.
- c. Remove any references to appendices in the Source-Wide PTI that no longer exist.

Review of the Draft Source-Wide PTI:

1. Provide the draft Source-Wide PTI to the District Inspector (if not the assigned staff) and the District Supervisor for review and comment. Request review and comment or concurrence on the draft Source-Wide PTI within 7 days.
2. Email the draft Source-Wide PTI to the company and copy the District Supervisor and District Secretary. Request review and comment or concurrence on the draft Source-Wide PTI within 14 days.
3. Address any comments received as appropriate.

Technical review notes for the Source-Wide PTI:

The technical review notes need to contain the reason the ROP was voided, the PTIs that were issued to the company and are included in the Source-Wide PTI, and any corrections/changes that were made to the Source-Wide PTI to reflect the original conditions in the PTI including removal of Rule 213 conditions. Also, it should be noted any federal requirements (e.g., NSPS, area source MACT, etc.) that the source is subject too and whether the requirements are included in the Source-Wide PTI.

1. Save the technical review notes using the Source-Wide PTI number and adding "Tech Review Notes" to the name.
2. Document the name of permit writer, District Inspector, and company concurrence on the draft conditions, and dates of processing actions.
3. Document correspondence with the company.

Final Source-Wide PTI:

1. When Source-Wide PTI is final, create the void letter per step 5 on page 3.