PASS-ROP

Frequently Asked Questions

Q. **What e-mail address should be used when e-mailing electronic applications to Air Quality Division?**

A. We have created one e-mail address that should be used for all electronic application submittals. This address is DEQ-ROP@michigan.gov. The applicant should enter "ROP Application", followed by the SRN, in the subject line of the e-mail (e.g., ROP Application - A1234).

Q. **Will the PASS-ROP software and any updates or enhancements be available on the internet?**

A. The PASS-ROP software is not able to be downloaded due to its size. However, the latest update to the software (a patch) is now available on the internet. The patch is located at http://www.deq.state.mi.us/aps/downloads/rop/ROPforms/rop_forms_PASS_patch.shtml. The patch will update any version of the software you may have to the most recent version. You must have the software installed on your computer in order to run the update. If you do not have the software, contact your district office and they will mail you a CD with the latest version of the software. Once you've installed the software, you can then obtain any future updates through the internet. If you have been working on an application and then update the software with the most recent patch, the data in the application that you have been working on will not be overwritten.

Q. **We have different submittal dates for the three "standard" reporting requirements in our ROP. Do we need to put these on an AR-002 form as a result?**

A. No. AQD staff will include the "standard" reporting requirements in your renewal ROP with the alternate dates you have listed in your initial ROP.

Q. **What would be listed as the origin on the AR forms for an applicable requirement for an exempt emission unit with source specific applicable requirements, but the EU is not currently in the ROP or in a PTI?**

A. The requirement would be listed with "Propose" as the origin, since it doesn't yet exist in a permit.

Q. **My ROP has a requirement that exhaust gases must be discharged unobstructed vertically upwards. Do I have to include this requirement in my application?**

A. No. This is a standard requirement and will be included in all ROPs, unless there is a specific reason to use different language. Only include an exhaust gas discharge requirement in your application if it is different than the standard requirement. (Note that applicable requirements specifying stack height and diameter must be included on an AR-001 form).

Q. **My company has recently been issued a Permit to Install for a new emission unit. We have not installed the new emission unit yet, and our ROP application for renewal is due soon. Do we have to include the new emission unit in our ROP renewal application, even though the emission unit will not be installed until after our application is due?**

A. No. This emission unit should not be included in your ROP renewal application if you have not installed the equipment by the time your application is due. If, however, the emission unit is installed prior to the issuance of the ROP renewal, the ROP application should be amended to include the new emission unit. If the emission unit is not installed until after the ROP renewal is issued, then the installation could be considered an "Off-Permit Change", provided it meets the criteria of Rule 215(3), and could be incorporated into the ROP upon the next renewal.

Q. **I have multiple stacks for one emission unit that all have the same height and diameter applicable requirements. Do I have to include a separate AR-001 form for each stack?**

A. No. Just include one AR-001 form for the stacks with the same applicable requirements. Under the Requirement Number on the AR-001 form, identify the stack section as a whole (e.g., E-1.1, I.B.).

Q. **If I have several emission units that are exempt under the same rule, can I put them all on one EU form?**

A. Yes. In the description portion of the form you could describe the number of units that are exempt under the same rule.

Q. **If I have an applicable requirement that references an appendix, do I also have to include the appendix as an applicable requirement?**

A. No. Just include the applicable requirement that references the appendix.

Q. **I have a visible emission monitoring requirement in my emission unit table, but there is no specific opacity limit in this table. What do I put on the AR-001 form?**

A. In this case, the visible emission monitoring requirement is likely included to demonstrate compliance with the 20 percent opacity requirement in the general conditions. List the opacity requirement in the general conditions on the AR-001 form.

Q. **I have one AR-002 form that is used to demonstrate compliance with applicable requirements in several different AR-001 forms. If I delete one of these AR-001 forms, will I lose this AR-002 form, even though it is linked to other AR-001 forms that I am not deleting?**

A. No. The software will recognize that the AR-002 form is linked to other forms and will not delete it. If you try to delete a form that has other forms linked to it, the software will give you a list of the other forms that will also be deleted if you continue on with the delete action. You have the option of canceling the delete action if you see that other forms you want to keep are about to be deleted.

Q. **If I have a control device for odor control, but the device is not required in my ROP or NSR permit, do I have to include this as an applicable requirement in my ROP application?**

A. No. The control device does not have to be included as an applicable requirement, but it should be listed as a control device on the appropriate EU form.

Q. **If stack testing is required to be conducted prior to renewal of the ROP, but it hasn't been conducted yet when I am preparing my renewal application, should I mark it on the AR-002 form as a future applicable requirement?**

A. No. The source is currently subject to this requirement, which is in place to demonstrate compliance with an existing emission limit. A future applicable requirement is one that has been recently promulgated and has future compliance deadlines.

Q. **Do I need to complete an MS-003 form if I have a permit condition in my current ROP requiring submittal of a plan that I have already submitted?**

A. An MS form would not be completed for a requirement that is already in an ROP. The MS forms are only for proposed requirements. A requirement for submittal of a test plan, preventative maintenance plan, etc., by a certain date, which has already past and the requirement has been complied with, need not be included in the ROP application.

Q. **If I am now subject to Compliance Assurance Monitoring (CAM) and have requirements that are not in my current ROP, do I have to include these as applicable requirements in my ROP application (even if I describe these requirements in my CAM plan attached to my application)?**

A. Yes. Use "Propose" for the origin of these new requirements.

Q.   How will the recently promulgated MACT requirements be incorporated into the ROP?
A. The same as other newly promulgated MACT standards or other new requirements. Under Rule 217, if three or more years remain in the term of a ROP, it will be reopened by the department to incorporate the newly issued or promulgated requirements.

Q.   What level of detail is required in the application for recently promulgated MACT standards that the source will be subject to in the future?
A. A high-level citation for MACT requirements is acceptable. The high-level citation should be entered on an AR-001 form as an "Other" applicable requirement type for the emission units that are subject to the MACT. An AR-002 form would not be required. If more information or some other type of explanation is necessary, the applicant can enter that on an Additional Information (AI-001) form.

Q.   If I have one AI-001 form that provides the same additional information for numerous emission units, can I link this one AI-001 form to more than one emission unit?
A. No. The software cannot accommodate this at this time. There must be a one to one relationship between the AI-001 form and any other form (for instance, only one AI-001 form can be linked to an S-001 form, only one AI-001 form can be linked to an EU-003 form, etc). You can copy the information from the initial AI-001 form and paste it to additional AI-001 forms. You can also just reference the initial AI-001 form when you create the other AI-001 forms.

Q.   If I submitted my application several years ago, and my ROP has not yet been issued, do I have to resubmit it using this software?
A. No. However, if there have been changes at your facility since your initial application was submitted, the application should be updated before the ROP is processed. We recommend that you use the new software if an updated application is necessary.

Q.   Why do I have to include emission units on an EU-001 form in my ROP application when they won't be in my ROP?
A. 40 CFR, Part 70.5, requires that they be included in an ROP application. Also, Michigan Air Pollution Control Rule 212(4) states that, unless subject to a process-specific emission limitation or standard, certain processes or process equipment need only be listed in an administratively complete application for a renewable operating permit. Equipment required on the EU-001 forms is the equipment specified in Rule 212(4) that need only be listed in the application. Although the equipment on the EU-001 forms does not appear in the ROP itself, it is included in the staff report that accompanies the ROP. Note that there are certain processes or process equipment listed in Rule 212(4) that are subject to process-specific emission limitations or standards. These are to be included on an EU-002 form in the ROP application (cold cleaners, surface coating equipment and equipment with limited emissions).

Q.   Will the issuance date of my ROP renewal be the same as the expiration date on my current ROP?
A. No, the issuance date of the renewal of your ROP will be some time after the expiration date. The renewal has to undergo the same process as the initial ROP, including public comment period and EPA review before being issued.

Q.   Is there a limit to the number of emission units that can be included in any one flex group?
A. No. There is no maximum, but there must be a minimum of at least two emission units per flex group.

Q. I have an emission unit that does not have any applicable requirements associated with it because all the applicable requirements for this emission unit are in a flexible group. Will I get an error message?

A. No. The completeness checker will recognize that the emission unit is included in a flex group.

Q. Are the descriptions in the Emission Unit/Process Group Summary Table of my ROP (Part C.) considered limits or requirements?

A. No.

Q. If I have a sectioned ROP with a source-wide limit, does it apply to the entire source?

A. Yes.

Q. Will the Owner information be used as the mailing address for the ROP?

A. No. The ROP will be mailed to the responsible official.

Q. I did not report cold cleaner emissions to MAERS. Do I have to report these emissions in my ROP application?

A. The MAERS guidance is very clear that, for an ROP source, all emission units that are in the source's ROP must be reported to MAERS. However, EPA's "White Paper for Streamlined Development of Part 70 Permit Applications", dated July 10, 1995, states "An application for a degreaser subject to a requirement to have a certain type of lid could describe the relevant applicable requirement and simply identify that it emits volatile organic compounds (VOCs) and falls within the scope of the regulation. Quantification of the VOC emissions would not be necessary since the level of emissions is not relevant to the standard."

Cold cleaner emissions should have been reported to MAERS if the emission unit was included in the source's ROP. If the emissions were not previously reported to MAERS, the White Paper provides that the emissions do not necessarily have to be included in the source's ROP application. But, the source should be made aware that these emission units should be reported to MAERS in the future. If "No" is checked for "Were The Actual Annual Emissions And Associated Data Previously Submitted to MAERS?", and the applicant is not providing emissions data, they should create an AI-001 form and state on this form that cold cleaners emissions are not being provided in this ROP application based on guidance in the July 10, 1995, White Paper.

Q. Will the "Flexible Groups" (Reporting Groups) from MAERS be imported into our application file for PASS-ROP?

A. No. The "Reporting Groups" in MAERS are different groupings than Flexible Groups, and won't be imported into the source's application file.

Q. Are the control device codes in PASS-ROP the same as the control device codes in MAERS?

A. Yes.

Q. Can I print a copy of my application after I have submitted it?

A. Yes, you just can't make any changes to it after the two day grace period. To locate the submitted file, chose File on the menu bar and select Open Application. When the Open Application window appears, look under the Submitted Applications tab.

Q. Can the S-002 form be modified to allow for consultant to be an official contact, similar to the new NSR application?

A. There are currently no plans to modify this form. Rule 204 allows a person to "file plans and specifications as the agent of an owner". It is not possible for a consultant to file an ROP application, as the application must be filed by the responsible official. The consultant can be

listed as the contact for questions concerning the submittal by listing their name on the S-002 form, but the certification form must still be signed by the responsible official.

Q.   Can I cut and paste information from a Word document into the AI-001 form?
A.   Yes.

Q.   When does the two day grace period for making changes to my application start?
A.   Once your application has successfully been prepared for submittal (i.e., once you have completed the steps under Submit Application in the Utilities menu). You have two calendar days, from this point, during which you can "Unsubmit" your application.

Q.   As a consultant, we want to provide our client with a hard copy of their ROP application to review and allow the Responsible Official to sign the C-001 form at that same time. Since this process will likely take more than two days, and there could possibly be changes needed to the application as a result of the company's review, how do we provide them with a C-001 form without preparing the electronic application for submittal?
A.   One way to handle this is to print out a C-001 form from the AQD web site where the hard copy versions of the PASS-ROP forms are located. This C-001 form could be filled out by the consultant and sent with the print out of the application for the Responsible Official to sign. When the application is sent back to the consultant for submittal, print out a blank C-001 form during the application submittal process and attach it to the C-001 form that that Responsible Official has signed. This will provide a signed C-001 as well as the verification number that AQD requires to process the electronic application.

Q.   If I have more than one section in my ROP application, do I print out a C-001 form for each section?
A.   Yes.

Q.   If I have a sectioned ROP, can I print out the forms for only one Section?
A.   No.

Q.   Can the ROP number be pre-filled on the AR forms if you select ROP as the origin?
A.   We are looking into not requiring the ROP number at all on the AR-001 and AR-002 forms if ROP is selected as the origin (since there is only one ROP for each source and the existing ROP number is provided on the S-001 form). However, until this change is made, sources should continue to provide the ROP number on the AR forms.

Q.   When will PASS-ROP be able to support modifications?
A.   This date has not yet been determined. It was intended that software development for processing modifications would be handled as a separate project in the future.

Q.   Is there a character limit on the AI-001 form?
A.   Yes, 7500 characters.