

Michigan Department of Environmental Quality Air Quality Division

INFORMATION FOR AN ADMINISTRATIVELY COMPLETE PERMIT TO INSTALL APPLICATION

BACKGROUND INFORMATION

A Permit to Install (PTI) is required to install, construct, reconstruct, relocate, or modify any process or process equipment, including control equipment pertaining thereto, which may emit an air contaminant pursuant to R 336.1201 (Rule 201). A process is an action, operation, or a series of actions or operations at a source that emits or has the potential to emit an air contaminant. Process equipment is all equipment, devices, and auxiliary components, including air pollution control equipment, stacks, and other emission points, used in a process. An emission unit (EU) is any part of a stationary source that emits or has the potential to emit an air contaminant. Air pollution control equipment is any method, process, or equipment that removes, reduces, or renders less noxious air contaminants discharged into the atmosphere.

A PTI application may be submitted for one or more interrelated processes at a source. Guidance documents, which describe Michigan's PTI Application Review Process, are available on the Internet at http://www.deq.state.mi.us/aps/miparp.shtml. PTI applications for large or complex sources, or substantial modifications to existing sources, should be discussed with the Air Quality Division (AQD) Permit Section well in advance of submitting an application. Permit Scoping Meeting (PSM) Scheduling Procedures are available on the Internet.

An administratively complete application for a PTI, including one to modify the terms and conditions of an existing PTI, must include a completed application form and reasonable responses to all requested information. This document provides a detailed description of the information requested in the basic application instructions on the back of the form. Although it should help clarify the information necessary for a complete application; this document is not intended to be all inclusive. Additional technical information may also be needed to complete the technical review of any individual application. The additional technical information for various processes, process equipment and air pollution control equipment is specified in separate documents in Section G. A checklist is included at the end of this document to assist in assembling the necessary information for each application.

Additional guidance which has been prepared by the AQD is available on the AQD Permit Web Page at http://www.deq.state.mi.us/aps/. If you do not have access to the Internet, or for technical questions or assistance, contact the AQD Permit Section at 517-373-7023.

PTI APPLICATION SUBMITTAL REQUIREMENTS

The application may be submitted using a paper form (EQP 5615) which includes basic instructions on the back of the form. The application form is also available on the Internet as a Microsoft Word template (EQP 5615E) with a separate document for application instructions. The template, which may be downloaded and completed on a computer, allows information to be entered without affecting the form itself.

Three (3) signed copies of the application form (EQP 5615 or EQP 5615E) must be submitted with two (2) copies of any additional supporting information. Applications cannot be accepted via facsimile. The application forms and the originals of all additional supporting information must be sent to Lansing. The second copy of additional supporting information may be submitted directly to the appropriate district office. If the information has been sent to the district, clearly indicate this on the application form or in a cover letter. A map which shows district boundary lines and includes district office addresses and telephone numbers is available on the Internet at www.michigan.gov/degair (select "AQD District Map") or by contacting the Permit Section.

<u>CONFIDENTIAL INFORMATION</u>: Information included in a PTI application cannot be claimed confidential, except for trade secrets or commercial or financial information pursuant to Section 13(1) of the Freedom of Information Act, 1976 PA 442, as amended. Section 5516 of Article II, Chapter 1, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, states that any information regarding the quantity, composition or quality of the emissions from a source <u>cannot</u> be held confidential.

PART 1 - COMPLETING THE APPLICATION FORM

Complete Items 1 through 12 as described below. Additional detailed information which does not fit in the spaces provided on the form should be enclosed and submitted with the application. Items 2, 3, 4, 6, 7, 10, 11, and 12 must be complete, or the entire application package will be returned.

Item 1 (Facility Codes) - The State Registration Number (SRN) is an alphanumeric identifier assigned to a stationary source by the AQD. The SRN is unique to the physical location of a source (except for portable equipment) and is comprised of a letter followed by four digits (i.e., A1497). The SRN for a facility can be found on the Michigan Air Emissions Reporting (MAERS) forms that are submitted annually to the AQD or on a previously issued PTI. If the application is for a new facility or one that has not had previous business with the AQD an SRN may not exist. The AQD will assign an SRN during the review of the permit application.

The North American Industry Classification System (NAICS) provides a numeric code that identifies an industry. It has replaced the Standard Industrial Classification (SIC) system. NAICS was developed jointly by the USA, Canada, and Mexico to provide new comparability in statistics about business activity across North America. Information about NAICS and links to the NAICS codes are available on the Internet at http://www.census.gov/epcd/www/naics.html. A six digit code is preferred for a more exact description, however five digits are acceptable.

Item 2 (Applicant Name) - The applicant should be the entity (e.g., corporation, partnership, individual owner, or government agency) that actually owns and/or is responsible for the operation of the process or process equipment.

Item 3 (Applicant Address) - This is the mailing address to receive correspondence regarding the application. Some large companies have mail codes, or internal routing addresses, to direct correspondences to a particular building or area in the facility. Include a mail code if applicable.

Item 4 (Equipment or Process Location) - This item need only be completed if the process location is different from the mailing address or if the mailing address is a P.O. Box. If a street address is not applicable or available, provide the township, range, and section where the equipment or process is located.

Item 5 (General Nature of Business) - Briefly describe the business, consistent with the NAICS Code provided in Item 1.

Item 6 (Equipment or Process Description) - A detailed description should be included as part of the application package. If the process description is lengthy, or specifics may be considered confidential, a brief, general description is acceptable under this item. Include unique descriptive Emission Unit (EU) IDs for all processes and process equipment. (See Part 2 - Additional Supporting Data for more details.) For an existing process or equipment which has been previously reported in MAERS, use the same EU IDs.

Item 7 (Reason for Application) – Check all that apply. Indicate if the application is for the installation or construction of a new process or equipment; the reconstruction, modification, or relocation of an existing process or equipment; or describe any other reason for submittal of the application. Other reasons for submittal include: to permit existing equipment not previously permitted; to consolidate existing permits; to opt out of the Renewable Operating Permit (ROP) program, 112(g) regulations or Maximum Achievable Control Technology (MACT) requirements; to resolve a letter of violation; or to limit potential to emit to become a synthetic minor for Rule 220 or Prevention of Significant Deterioration (PSD). For existing equipment, include the date of original installation.

Item 8 (Active Permits to Install) – Existing permits to install may contain information for the process or equipment identified in this application. If the process or equipment that will be covered by this PTI is currently covered by any existing active permits, list the PTI number(s).

Item 9 (Renewable Operating Permit) – A facility which is a major source is subject to the Renewable Operating Permit (ROP) program. If this facility is not a major source and is not subject to the ROP Program, check "Not Applicable". If an ROP has not been issued, but an application has been submitted, check "Pending Application" and provide the application number. If an ROP exists for this facility, check "Yes" and provide the ROP number.

Item 10 (Authorized Employee) - The application must be signed by an authorized employee of the applicant identified in Item 2. This signature certifies the truth of the information provided in the application. Provide the name, title, telephone number (extension if applicable) and e-mail address for the individual signing the application. NOTE: Agents cannot sign the application form. (See Item 11)

Item 11 (Contact and Affiliation) – If someone other than the authorized employee should be contacted with questions regarding this application, provide the name, title, telephone number (extension if applicable) and e-mail address for the contact. A contact person not employed directly by the applicant, such as an attorney or a consultant, may file an application as an agent of the applicant pursuant to Rule 204 (R 336.1204); however, an agent may not sign the application. If the contact is an agent, include the name of the company the agent is affiliated with (e.g., consulting firm, law firm).

Item 12 (Authorization Question) – Rule 204 requires the applicant to provide written authorization for the filing of an application by an agent. The authorization should indicate if the applicant intends that the department contact the agent directly with questions regarding the application and whether

the agent is authorized to negotiate the terms and conditions of the PTI. If the application is being filed by an authorized agent, completing Items 10 - 12 will serve as the required written authorization.

PART 2 - ADDITIONAL SUPPORTING INFORMATION

R 336.1203 (Rule 203) identifies the technical information necessary for a complete permit application. All of the subparts of Rule 203 may not be required for a specific application. However, certain basic technical information including a site description, emission rates, and stack information should be included with an application. If a permit application is determined to be incomplete, the application will not be accepted, but will proceed through the "Off-Line" Tracking (OLT) process. Procedures for the OLT process are available on the Internet. Two (2) copies of additional supporting information must be submitted as a part of a PTI application. This information should be organized into sections, with each section clearly identified and assembled in the following order.

A. Process Description

In addition to the general process description which must be included in Item 6 on the application form, include a detailed description of each process or piece of process equipment included in the PTI application. This detailed description should include all of the following information:

- 1. The size and type along with the make and model (if known) of each piece of proposed process equipment, including any air pollution control equipment. Any available literature from the manufacturer may be helpful in providing this information.
- 2. Emission Unit IDs for all processes and process equipment. An emission unit (EU) is any part of a stationary source that emits or has the potential to emit an air contaminant. Examples of an emission unit include a fossil fuel-fired steam generating unit, a painting line, a solid waste incinerator, or a process unit at a chemical plant. An Emission Unit ID is a unique descriptive identifier for a given emission unit. Some examples include EU-FURNACE, EU-BOILER#2, EUGASBOILER, EULINE-001. The AQD Operational Memorandum No. 6, "Procedure for Determining Emission Units," is available on the Internet at www.michigan.gov/deqair (select "Laws and Rules", and "Operational Memorandums") or by contacting the Permit Section. It provides definitions and additional information to determine what constitutes an emission unit. For an existing process or equipment which has been previously reported in MAERS, use the same EU IDs.
- 3. The normal and maximum operating schedule for the process and/or each stack/vent, in hours per day, days per week, and weeks per year. For batch processes, provide the length of time per batch and the frequency of the batch operation in batches per day and batches per month. NOTE: If the emissions allowed by the PTI are based on an operating schedule less than 24 hours per day, 7 days per week and 52 weeks per year, the reduced operating schedule may be included as an enforceable condition of the PTI.
- 4. Details of the type and feed rate of each material used in or produced by the process (including intermediate products if appropriate) in pounds per hour or similar measure.
- 5. For fuel burning processes provide the following information related to the fuel burning device(s): make, model, size, type, capacity range (from minimum to maximum) and number of each device. For gaseous fuels, provide the type, maximum cubic feet per hour, and an ultimate analysis for gaseous fuels other than sweet natural gas or propane. For fuel oil, provide the fuel oil grade, maximum gallons per hour, sulfur content, and temperature to which

oil is preheated, if applicable. Include characterization specifications for recycled used oil. For solid fuels, provide the type, ultimate analysis, and maximum pounds per hour.

- 6. A brief description of any waste generated by the process or the air pollution control equipment and the proposed method of reuse, treatment, or disposal of that waste.
- 7. If the application is for complex or multiple processes, include a block diagram that shows the flow of materials, including any intermediate and final products.

B. Regulatory Discussion

Describe all federal and state air pollution control regulations which may be applicable to the proposed process or process equipment. Include a discussion of how the proposed process or process equipment complies with each of these regulations. Air pollution control requirements that are applicable to the proposed process may be contained in any of the following:

- 1. Michigan Act 451 of 1994, as amended, the Natural Resources and Environmental Protection Act, Part 55
- 2. The Michigan Air Pollution Control Rules
- 3. The Federal Clean Air Act
- 4. The Code of Federal Regulations, especially:
 - 40 CFR, Part 52.21 Prevention of Significant Deterioration
 - 40 CFR, Part 60 National Standards of Performance for New Stationary Sources (NSPS)
 - 40 CFR, Part 63 National Emissions Standards for Hazardous Air Pollutants for Source Categories (NESHAP). This includes Part 63.40 63.44 and Part 63.50 63.56, Sections 112(g) and 112(j).

Information regarding applicable requirements, including the state air pollution regulations, various Operational Memorandums, and links to various federal EPA sites can be found on the Internet at www.michigan.gov/deqair (select "Laws and Rules"). In addition, the AQD has prepared several guidance documents to summarize and clarify some of the state and federal regulations. These include: Federal PSD Requirements, Guidelines for a Netting Demonstration, Guidance for a Title V Opt-Out Permit, Toxic Air Contaminants – Demonstrating Compliance with Rule 225, Instructions for Conducting a BACT Analysis, Guidelines for Conducting a Rule 224 T-BACT Analysis, and Guidelines for Conducting a 112(g) Analysis. All guidance documents are available on the AQD Permit Web Page at http://www.deq.state.mi.us/aps/.

The documents listed in Section G (Additional Technical Information Required for Specific Processes and Equipment) include the specific applicable requirements that may apply to the individual processes, process equipment and control equipment.

C. Control Technology Analysis

Describe how the air contaminant emissions from the proposed process equipment will be controlled or otherwise minimized. Air pollution control equipment is any method, process, or equipment that removes, reduces, or renders less noxious air contaminants discharged into the atmosphere. This definition includes pollution prevention or other methods which result in reduced emissions from the process. Provide sufficient detail to determine the extent to which the air pollution control equipment will be used to control emissions from the process equipment listed in the application

and to determine the control efficiency of the air pollution control equipment. The information needed to show the control efficiency of the air pollution control equipment may include process-specific calculations (e.g., calculation of the particulate emission control efficiency may depend on the particle size distribution of the exhaust gas being controlled). If applicable, also include a description of any proposed air pollution control equipment bypass. Generally, inputs to the process must cease immediately in the event of a bypass of the air pollution control equipment, except as provided by Rule 913 and Rule 914.

Additional specific control technology analyses may also be necessary, depending on which rules or requirements apply to the proposed process or process equipment. These specific analyses include:

- Lowest achievable emission rate (LAER), which applies to a major source and/or major modifications at a source located in non-attainment areas. Currently the only two pollutants which may be subject to LAER in Michigan are VOCs and NOx. LAER is defined as "the lowest emission limitation contained in any State Implementation Plan (SIP) or the lowest emission limitation achieved in practice." Such an emission limit is presumed to be LAER for that class and category of facility. If an applicant proposes to meet this presumptive LAER, no site-specific control technology determination will be necessary. When an applicant believes the presumptive LAER limit is not achievable, a site-specific determination is required. This determination should include consideration of raw material changes, process changes, and add-on control equipment. The cost of these changes will not be considered. Raw material and process changes should be evaluated through technology transfer (i.e., the likelihood that such a change will transfer from one industry to another), based on the manufacture of similar products or use of similar raw materials or fuels. Add-on controls should be evaluated based on the physical and chemical characteristics of the pollutant-bearing exhaust stream.
- PSD Top-down BACT, which applies to a major source and/or major modifications at a source of any criteria pollutant located in an attainment area. The Clean Air Act defines BACT as "an emission limitation based on the maximum degree of reduction for each pollutant." BACT should be applied on a flexible grouping of equipment subdivisions of emission units and/or groupings of emission units as long as it is logical to do so. Logical means that the principles on which the groupings (or subdivisions) are made are consistent with federal guidance and sound engineering practices. Refer to *Instructions for Conducting a BACT Analysis* for additional detailed information.
- Rule 702 BACT, which applies to all sources of VOCs proposed to be installed within the State of Michigan. A Rule 702 BACT analysis is very similar to a top-down BACT analysis. Michigan's air pollution control rules also define BACT as an emission limit. Rule 702 BACT should be applied on a flexible grouping of equipment subdivisions of emission units and/or groupings of emission units as long as it is logical to do so. Logical means that the principles on which the groupings (or subdivisions) are made are consistent with federal guidance and sound engineering practices. Refer to *Instructions for Conducting a BACT Analysis* for additional detailed information.
- Best Available Control Technology for Toxics (T-BACT), which means the maximum degree of
 emission reduction which the Department determines is reasonably achievable for each
 process that emits toxic air contaminants (TACs) taking into account energy, environmental
 and economic impacts, and other costs. T-BACT does not apply to VOCs. The analysis must
 be specific to the process and the TACs subject to a T-BACT review. T-BACT limits can be
 expressed as an emission limit, control equipment requirements, and/or work practice
 standards. Refer to Guidelines for Conducting a Rule 224 T-BACT Analysis for additional
 detailed information.

Section 112(g) regulations of the federal Clean Air Act require any constructed or reconstructed major source of Hazardous Air Pollutants (HAPs) be equipped with Maximum Achievable Control Technology (MACT) for individual and total HAPs greater than 10 and 25 tons per year, respectively. Refer to Guidelines for Conducting a 112(g) Analysis for additional detailed information. Additional MACT information, including a MACT Information Checklist, is available on the Internet at http://www.deq.state.mi.us/aps/downloads/MACT/112g.shtml.

D. Emissions Summary and Calculations

Explain clearly and in appropriate detail the nature and quantity of all pollutants (both controlled and uncontrolled) that are reasonably anticipated to be discharged to the atmosphere due to the operation of the source. Include all calculations used to determine the emission rates and describe any emission factors used or assumptions made. Include test data/documentation to support all assumptions made. For repetitive calculations, a sample calculation may be provided. Calculations should clearly show all reductions in expected emissions resulting from the use of add-on air pollution control equipment. Emission information may be provided in a table format and should include the following information:

- 1. The normal and maximum expected emissions of criteria pollutants (CO, NOx, PM, PM-10, SO₂, VOCs, and lead) and hazardous air pollutants (HAPs) (both individual and aggregate) on an hourly and annual basis, from each emission unit (EU) and any other units specified in any federal or state air pollution control regulations which were identified in the Regulatory Discussion as applicable to this process.
- 2. The normal and maximum expected emissions of all toxic air containments (TACs) from each stack/vent on an hourly and annual basis. Provide the stack concentration and predicted ambient impact (PAI) in micrograms per cubic meter (ug/m³). List each TAC individually and include the Chemical Abstract Service (CAS) number. Refer to *Toxic Air Contaminants Demonstrating Compliance with Rule 225 Requirements* and *Guidelines for Dispersion Modeling* for additional information.

NOTE: The maximum controlled emission rates for the process will be reflected in legally enforceable permit conditions. Therefore, all emission estimates should include a reasonable margin of safety to ensure that the process can operate within those limits.

E. Stack/Vent Parameters

Exhaust gases should be discharged unobstructed vertically upwards to maximize dispersion of air contaminants. In addition, a stack height design of at least one and one half (1.5) times the building height above the ground will minimize the potential for emission downwash problems.

For each stack/vent, include all of the following information (including ranges if appropriate) and provide all assumptions, calculations, and other documentation used.

- 1. The minimum height above ground level at the discharge point, in feet.
- 2. The maximum internal diameter or dimensions at the discharge point, in inches.
- 3. The orientation of the discharge (e.g., vertical, horizontal, gooseneck).
- 4. The maximum volume flow rate of the exhaust gas, in cubic feet per minute (cfm). Please note whether the flow rate is based on actual or standard cfm.

- 5. The maximum temperature of the exhaust gas at the discharge point, in degrees Fahrenheit.
- 6. A description of any rain protection device.
- 7. If the stack/vent is to be equipped with stack testing ports, describe the size and location of such ports.

F. Site Description and Process Equipment Location Drawings

Provide legible scale drawings that show a plan view of the property to the boundary lines. A scaled site plan does not necessarily mean construction drawings or blueprints. A site plan should include all of the following information:

- 1. The outline and dimensions (length, width, and height at roof peak and eaves) in feet, of all buildings and structures on the owner's property and any other buildings or structures within either of the following:
 - Within 150 feet of any process stack/vent proposed or identified in the application, or
 - Within a distance of five (5) times the height of that building or structure to any stack/vent proposed or identified in the application (e.g., the dimensions of a building with a height of 50 feet would have to be included on the site plan if it is within 250 feet of a stack/vent proposed or identified in the application).
- 2. All property lines and any fence lines.
- 3. The location and identification of the process equipment proposed to be installed or modified in the application.
- 4. The location of all stacks/vents identified in Section E and the distance(s) to the nearest property line(s).
- 5. The direction of North and sufficient detail to enable the permit reviewer to accurately orient the site to the surrounding area.
- 6. The scale of the plan (e.g., 1 inch = 100 feet).

G. Additional Technical Information Required for Specific Processes and Equipment

The following documents clarify the additional technical information for specific processes, process equipment and control equipment. They are available on the AQD website at http://www.deq.state.mi.us/aps/. Select "Air Use Permit Application Form & Instructions", then "Supporting Information Sheets". If you do not have access to the Internet, documents may be obtained by contacting the Permit Section at 517-373-7023.

Processes/Process Equipment

Anhydrous Ammonia Storage Grain Elevators

Asphalt Plants Graphic Arts - Printing

Auto Paint Shops and Assembly Plants Incinerators – General Refuse
Boilers Incinerators - Medical Waste

Burnoff Ovens (Natural Gas-Fired) Incinerators - Pathological Waste

Chemical/Pharmaceutical Processes Landfill Waste-to-Energy Facilities (including flares)

Coating Operations – Metal Coils Material Handling Operations

Processes/Process Equipment

Coating Operations – Metal Furniture Metal Shredders

Coating Operations – Misc. Metal Parts Municipal Waste-to-Energy Facilities
Coating Operations – Plastic Parts Natural Gas Sweetening Facilities

Coating Operations – Wood Furniture Paper Machines

Concrete Batch Plants Reciprocating Internal Combustion Engines (RICE)

Crushers (Concrete, Asphalt, Rock) & Remediation Operations - Groundwater

Limestone Quarries Remediation Operations - Soil

Degreasers Rendering Facilities
Dry Cleaners Shot Blasting

Engine Test Cells Sour Oil and Gas Well Equipment

Ethylene Oxide Sterilizers Storage Tanks - General

Fiberglass Reinforced Plastics Operations Surface Treatment (Plating, etc.)

Fluorescent Light Bulb Crushers Waste Oil Firing Equipment

Foundry Processes Welding Operations

Gas Turbines Woodworking Operations

<u>Air Pollution Control Equipment</u>

Acid Gas Scrubber Cyclone Dust Collector

Afterburner – Catalytic Oxidizer Electrostatic Precipitator (ESP)

Afterburner – Thermal Oxidizer Fabric Filter (baghouse, cartridge)

Condenser Scrubber

Revised 10/2009

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Michigan Department of Environmental Quality Air Quality Division

CHECKLIST FOR SUBMITTING AN ADMINISTRATIVELY COMPLETE PERMIT TO INSTALL APPLICATION

The Appli	ication Form:
The equipulation in the eq	application form (EQP 5615 or EQP 5615E) is dated "Rev. 9/2006" or later. application form includes the applicant's name, address and the complete location of the pment in Items 2, 3, and 4. application form includes a brief description of the proposed process or process pment in Item 6. The description includes why the application is being filed (e.g., install equipment, modify existing permitted equipment, permit existing equipment not riously permitted, modify existing permit w/o change in equipment, limit potential to emit). application form is signed by an authorized employee of the applicant. (Agents cannot the application) pies of the application form and 2 copies of all attachments are provided.
Technical	I Attachments:
	Process Description
A un The The A de	Implete written description of each piece of proposed process equipment is included. Indique descriptive identifier (Emission Unit ID) is provided for each proposed emission unit. In normal and maximum operating schedules of the proposed process are described. It type and feed rates of materials to be used in the proposed process are described. It fuels and firing devices (if any) to be used in the proposed process are described. It is esscription of any wastes generated and reuse, treatment or disposal methods is included. It is with diagram is included for complex or multiple processes.
	Regulatory Discussion
How If the a Se	escription of the applicable requirements which apply to the proposed process is included. If the proposed process will comply with those requirements is discussed. The equipment is a new or reconstructed major source of Hazardous Air Pollutants (HAPs), ection 112(g) MACT Information Checklist form and all information requested on that form cluded.
	Control Technology Analysis
A de	escription of the proposed control technology is included.
The	efficiency of the proposed control equipment is described.
	ilable pollution prevention techniques were considered to reduce emissions from the bosed process or process equipment.

Emissions Summary & Calculations
The total emissions of criteria pollutants and Hazardous Air Pollutants (HAPs), from each emission unit, including any related emissions increases from existing equipment, are included. A summer table may be used
included. A summary table may be used. The total emissions of all toxic air contaminants (TACs) from each stack/vent and the stack
concentrations are included. A summary table may be used. All calculations used to determine the emission rates and a description of any assumptions
made or emission factors used are included.
Stack/Vent Information
The following stack parameters are provided for each stack:
Minimum height above ground Maximum exhaust gas temperature
Maximum internal diameter Discharge orientation
Maximum volumetric flow rate Description of rain protection
Location of any stack testing ports
Site Description and Process Equipment Location Drawings
The site plan includes all of the following information:
Building dimensions Property and fence lines
Adjacent properties and structures Proposed equipment locations
Stack/emission point locations Property line distances
North direction Scale
Other Information:
Confidential Information
If information claimed as confidential is included in the application, it has been clearly
marked, separated, and summarized for the public file.
Construction Waiver
If a construction waiver is required as provided by Rule 202, a letter requesting the waiver,
with a description of the undue hardship which would be caused by the delay, has been
submitted to the appropriate District Office.
Clean Corporate Citizen
If the source has received a Clean Corporate Citizen designation and is requesting one of the
benefits provided by Rules 1413, 1414, or 1415, that information is clearly indicated on the
application form and the information required for that benefit is included.