MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

ROP Pre-application Meeting Procedure and Timeline

Objective:

Meeting of company and Air Quality Division (AQD) representatives to discuss the Renewable Operating Permit (ROP) application process and to develop a schedule for submitting the ROP Renewal Application. Discussion topics should include: status of facility (compliance, changes, etc) and any associated revisions to the existing ROP, including any proposed modifications and any new applicable requirements. During the meeting, a timeline for ROP development should be discussed by the AQD and company.

Procedures:

1. Eighteen months prior to ROP expiration, a ROP Renewal Reminder Submission Due (18-month Notification) will be sent via email from MiEnviro Portal.
2. District staff can add a pre-application meeting reminder in Outlook (or other planner) for two months from the date the email notification is sent.
3. In the event the company does not contact the AQD District within two months of the renewal reminder, AQD District staff should contact the company about scheduling a pre-application meeting.
4. The meeting should be scheduled no less than 1 year prior to expiration of the ROP.
5. AQD staff should conduct a compliance review of the facility prior to the pre-application meeting. The compliance review should include a Full Compliance Evaluation (FCE) within two years prior to the pre-application meeting.
6. The meeting should include the environmental contact(s) for the company, AQD District staff, AQD Permit Writer (if different from District staff), and District Supervisor.
7. During the meeting, the following information should be discussed. (This information can be requested from the company ahead of the meeting to allow time to review and to determine any additional information needs.)
    a. The current compliance status of the facility. Issues of unresolved non-compliance should be discussed and a determination made as to how to address these issues within the renewed ROP.
    b. Any changes proposed or implemented at the facility since issuance of the current ROP. This includes changes in equipment, process, location, and contacts.
    c. Any ROP modifications planned or that have been submitted to the AQD since issuance of the current ROP.
    d. Any new Permits to Install (PTIs) issued since issuance of the current ROP.

e. Any new applicable requirements or new regulations that may apply since issuance of the current ROP. This includes any new federal or state requirements.

f. The company should be directed to MiEnviro Portal for the ROP application form and discuss whether submission of a Word document mark-up of the current ROP as part of the renewal application package is needed.

g. Also, check if the responsible official or authorized representative has certifier status approved in MiEnviro.

8. An initial proposed schedule for issuance of the renewal ROP can be drafted using the timeline template available in Excel in the ROP Manual under 1.A: “Timeline” or you may print the word version below. The schedule should include a date by which the company anticipates submitting the ROP renewal application. The timeline is based on the Lean Process Improvement (LPI) processing goal of 12 months, and can be provided at the meeting for reference.

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ROP Renewal Application Processing Timeline

Facility Name: **SRN:** **Pre-Application Meeting Date**:
Due Date:

Task	Timeline Recommendation	Proposed Submittal Date / Date Received	Date Completed	Comments
Application to be submitted	12 months prior to expiration	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}
Administrative Completeness Check	15 calendar days	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}
Technical Review Complete -- including all additional information requests and completion of draft staff report and working draft ROP	7 months	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}
Company Review Working Draft ROP	21 calendar days (21-30 day review)	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}
Address Company Comments Convert Working Draft ROP to Draft ROP, Finalize Staff Report	14 calendar days	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}
Post Public Notice/Calendar Notice	7 calendar days	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}
Public Comment/Affected States Review (Draft Permit)	30 calendar days	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}
Public Hearing if requested	0 calendar days (45 days if requested)	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}
Revisions/Company Review (if needed). Convert Draft ROP to Proposed ROP, Add addendum to Staff Report	16 calendar days	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}
EPA Review (Proposed Permit)	45 calendar days	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}
Issue Permit	5 calendar days	MM/DD/YEAR	MM/DD/YEAR	{Add Comments or NA}