MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

Air Quality Division

ROP Administrative Completeness Check Procedures

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Overview

This document is a guide through the administratively complete review process of the application form for an ROP. Every ROP application needs to be reviewed for administrative completeness to confirm it contains reasonable responses to all requests for information in the ROP application form. An administratively complete application must be received within 12 months of a source becoming subject to the Title V program or between 18 months to 6 months prior to the expiration of their current ROP. The AQD has 15 days to review the application for administrative completeness. If the administrative completeness review is not completed within 15 days of receipt of the application, it is automatically deemed administratively complete. Once an application has been deemed administratively complete, an application shield letter will be emailed. If it is a renewal, the facility may continue to operate under the conditions of the existing ROP while the AQD processes their renewal permit.

Note: Refer to the MiEnviro ROP Internal User Guide for specific MiEnviro functions and instructions as you review the application.

There are multiple ways to request additional information, if necessary, as you review the application in MiEnviro. You can request amendments as comments within the application document or attach a letter (from our templates) to the application if a significant amount of additional information is needed. If possible, the entire application should be reviewed before a correction request is sent, to avoid a piecemeal approach. Any requests for corrections or additional information should be made so that the facility can attach additional documents or updates directly to the application and all information can ultimately be accessed by the public.

As you verify the information in the application, update the workflow in MiEnviro by completing the following tasks:

- Screen (verify that the application is signed by the Responsible Official (RO) or Authorized Representative)
- Verify that the applicant included correct attachments
- Review for administrative completeness (if the applicant checked the confidential information box, verify that the confidential information is included with the application)
- Application shield and letter sent (assign this step to the Secretary)

Site Information/Details

(Initial ROPs: Section S-001, Renewal ROPs: Part A)

Use the Site Details Functional Area of MiEnviro to Verify

- SIC and NAICS Codes
- Site name and physical address
- Primary/Secondary contact information
- Primary/Secondary Responsible Official information
    - **Verify that the person assigned as the RO is eligible according to Rule 118(j)**

Document this information in the "Site Information" section of your Technical Review Notes.

Application Submittal and Certification

(Initial ROPs: Section ASC-001, Renewal ROPs: Part B)

Review the compliance statements for accuracy based on your knowledge of and experience with the source.

If the facility responds "no" to any questions in the Compliance Statement area, verify that a compliance plan and schedule of compliance is in the attachment control.

Site Requirement Information

(Initial ROPs: Section S-003, Renewal ROPs: Part C)

This section requires the source to indicate if it is subject to one or more specific regulations and to include any additional information. ***You will do a more in-depth review of the PTE and CAM details after your Administrative Completeness Check is completed.***

- Federal ozone-depleting substances program: 40 CFR Part 82 has not been delegated to the State. However, since the ROP is a federally-enforceable permit, the company must state whether or not it is subject to these requirements. Part 82 requirements are referenced in the ROP General Conditions.
- 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). Section 112(r) requirements are referenced in the ROP General Conditions.

- If “Yes,” the applicant will be reminded that a Risk Management Plan and any updates must be submitted to the USEPA.

- Potential to Emit (PTE) Demonstrations:
  - FOR INITIAL ROPs: Verify if a PTE demonstration for criteria pollutants (CO, NOx, PM10, PM2.5, SO_2, VOC, lead) and HAPs has been attached. (This is required.)
  - FOR RENEWAL ROPs: If the source has added or modified equipment since the last renewal that would change the PTE for criteria pollutants or for HAPs, verify that the information regarding potential emissions such as a PTE has been attached.
  - Review any PTE demonstration submitted with the application for reasonable responses. Corrections can be requested during technical review as necessary.
- Cross State Air Pollution Rule (CSAPR): If yes, the applicant will need to identify the emission unit(s) subject.
- Acid Rain: If yes, the applicant will verify that the Acid Rain Permit Application form was submitted.
- Compliance Assurance Monitoring (CAM):
  - If applicable, verify that a CAM Plan was attached.
- Required management and work practice plans:
  - If the applicant indicates that they have required plans, verify that the plans are attached.
- Non-Applicable Requirements: If yes that specific requirements or regulations are not applicable, verify that a justification was included.

Emission Units Meeting Criteria of Rule 212(4) Exemption

(Initial ROPs: Section EU-001, Renewal ROPs: Part D)

Note: Emission units that are subject to process-specific emission limitations or standards, even if identified in Rule 212, must be captured in the application form.

- Verify the exempt emission units have been included and the corresponding exemption rules are identified.

Emission Units Meeting the Criteria of Rules 281(2)(h), 285(2)(r)(iv), 287(2)(c), or 290 Exemptions

(Initial ROPs: Section EU-002, Renewal ROPs: Part G)

- Verify the exempt emission units have been included and the corresponding exemption rule (applicable requirements) are identified.

Existing ROP Information

(Renewal ROPs only: Part E)

- If the applicant indicated there are proposed changes to the existing ROP, verify that there are changes identified in Parts F, G, or H.
- If the applicant indicated that units identified in the existing ROP have been dismantled or permanently shutdown, verify during technical review.

Permit to Install (PTI) Information

(Initial ROPs: Section EU-003, Renewal ROPs: Part F)

- For initial ROPs: Review any requested changes, additions, or clarifications listed in this section, but further evaluation will occur during technical review.
- For renewals: If the source indicates they have obtained PTIs that have not yet been incorporated into the existing ROP, verify all “In Effect” PTIs are listed on the application.

Other Emission Units

(Initial ROPs only: Section EU-004)

- Review the emission units listed here that have applicable requirements but have not been addressed in any other section of the application.

Applicable Requirements from MACT, NESHAP, or NSPS

(Initial ROPs only: Section AR-001)

- Review the table and template selections listed, but further evaluation will occur during technical review.
- Note if the facility is requesting to streamline any requirements. This will be addressed further in technical review.

Other Applicable Requirements and Additions or Changes

(Initial ROPs: Section AR-002, Renewal ROPs: Part H)

- Verify that any other requirements and proposed changes are included:
    - New federal applicable requirements (i.e., MACT, NESHAP, or NSPS)
- Verify if any applicable Consent Orders, Consent Judgements, or Consent Decrees not yet incorporated into the existing ROP are listed the application
- Source-Wide requirements **(Initial ROPs: Section AR-003)**
    - Verify PTI information included in the table and any attachments
- Note any proposals for streamlined requirements or changes to emission limits, material limits, process/operational restrictions, design/equipment parameters, testing/sampling, monitoring/recordkeeping, reporting, stack/vent restrictions, etc.
- Verify any justifications provided in the application during technical review.

AI-001: Additional Information

(Initial ROPs and Renewal ROPs: Section AI-001)

- Verify if the necessary attachments are present and review the information for reasonable responses. Corrections can be requested during technical review as necessary.

Confidential vs. Public Information

If the applicant indicated the need to submit confidential information, verify that the confidential information is included with the application.

Signing

Verify that the individual that signed the application is the Responsible Official or their authorized representative.

Complete Your Review

If the submission application is administratively complete, leave the submission “locked for review”. If resubmittal is required, fill out the Correction Request and click on “Complete Review” so the facility can be notified by MiEnviro.

In the Submission Details tab, fill in the **Application Administratively Complete Date**. If the application was received as complete, the administratively complete date is the

date the application was received. If additional information / corrections were requested, then the administratively complete date is the date the information was received to complete the application.

You can still request subsequent additional information during technical review after the application has been deemed administratively complete. Always include a due date in your request for additional information.

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