Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division

Public Participation Procedures

For

Renewable Operating Permits

Reopenings

Revised

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Reopening (Rule 217(2)) Overview

Rule 217(2) describes reopening of an ROP for cause. A reopening must meet one of the following criteria:

(1) To incorporate a new applicable requirement issued or promulgated after the issuance of the ROP if 3 or more years remain in the term of the permit. This must occur as expeditiously as possible, but not later than 18 months after promulgation of the applicable requirement.
(2) To incorporate new applicable standards and requirements for affected sources pursuant to Title IV of the Clean Air Act.
(3) If the Department determines that the permit contains a material mistake, the information required by any applicable requirement was omitted, or that inaccurate statements were made in establishing the emission limitations or standards or the terms and conditions of the permit.
(4) If the Department determines that the permit must be revised to ensure compliance with the applicable requirement.

A reopening can only affect those parts of the ROP for which cause to reopen exists. It is very important to emphasize that fact in the associated documents, especially in the letter to the company, the Public Notice and the Staff Report.

I. Reopening (REO) Notification

Staff	1. Create a notice of intent to reopen the ROP using **ROP Reopening Company Notification.dot.**
Staff	a. If the REO involves a renewable non-ROP permit (e.g. Acid Rain Permit), address the letter to both the Responsible Official(s) (RO) and Designated Representatives(s) (DR). Contact Brian Carley if you need to confirm the current DR(s). Copy Brian on the letter.
Staff	b. Save as "**SRN REO ROP Company Notification.docx**." The notice must be provided at least 30 days in advance of the date that the ROP is to be reopened and specify the reasons for the reopening.
Staff/Sec	2. **MACES:** Treat the REO notice as if it were an application submittal from the source. Enter into MACES the date that the REO notice was sent to the company as "Date Received." (Although no application is submitted by the company, the date of the REO notice is comparable to an application received from a source for starting the issuance clock and is handled accordingly.) Click on "Application Type" and select "Reopening." Click on "Staff" and enter the Staff Person assigned. Click the "Save" Button. "Reopening-Notice Sent to Source" will be displayed under the "Event Type" and the received date will show up under the "Event Date." No further action is required in MACES at this time.

II. REO Working Draft

	1. REO Working Draft:
Sec	a. Save a copy of the existing ROP as "**SRN REO Working Draft {MM-DD-YY}.docx**."
Sec	b. Add "{DATE} REO WORKING DRAFT" in the header of each page of the REO Working Draft, including the first page. On the ROP cover page, insert "Revision Date: {*date of approval*}" on a new line under the "Effective Date" if this is the first revision of this ROP.
	c. Add the small letter in sequential order to the ROP to indicate that the ROP has been revised, e.g. MI-ROP-Z9999-2011a. Do likewise if a Source-wide PTI is affected, e.g. MI-PTI-Z9999-2011a.
Staff	d. Make the changes to the ROP that were specified in the notification to the company. If needed, insert the appropriate Optional Conditions from the ROP Shell template into the appropriate ROP table. If the REO involves a renewable non-ROP permit, insert that permit into the document as the appropriate appendix.
Sec	e. Update the Table of Contents by either right clicking on the Table of Contents and choosing "Update field"/"update entire table" or pressing F9 and choosing "update entire table."
Sec	f. Again, save the REO Working Draft as "**SRN REO Working Draft {MM-DD-YY}.docx**."
Sec	g. If necessary, have your FITT representative scan any hard copy documents that need to be converted to electronic format.
	2. Staff Report Addendum:
Staff/Sec	a. Insert the REO addendum into the Staff Report. Open the existing Staff Report and click on the "Insert Addendum/ Amendment/ Modification" button on the Toolbar and select "Reopening - Draft." Include appropriate detail regarding the change(s).
Sec	b. Add the small letter in sequential order to the Staff Report Cover Page and New Reopening Addendum ONLY to indicate that the Staff Report has been revised, e.g. MI-ROP-Z9999-2011a
Sec	c. Update the Table of Contents by either right clicking on the Table of Contents and choosing "Update field"/"update entire table" or pressing F9 and choosing "update entire table."
	d. Save as "**SRN REO Draft Staff Report {MM-DD-YY}.docx**."
	3. Supervisor review:
Staff	a. Provide copy of the REO Working Draft and the REO Draft Staff Report to supervisor.
Staff	b. Incorporate all changes as a result of that review.
Sec	c. Update the date in the header of the official REO Working Draft to be the date it will be sent to the company.
	4. Send to company:
Sec	a. Create the cover letter for the REO Working Draft using **ROP Letter for Company WD Review, 30&45-Day Notice.dot**. Specify a minimum of 21 days (and a maximum of 30 days) for the company to review the REO Working Draft and provide comments to the district (unless a shorter time frame is agreed upon by the permit reviewer and the company).
Sec	b. Save as **"SRN Letter with REO Working Draft.docx**."
Sec	c. Finalize Letter after staff review. (See Appendix G of the ROP Public Participation Procedures in the ROP Manual (5.A) for key issues.)
Sec	d. Send the letter to the RO(s) with a copy of the REO Working Draft and REO Draft Staff Report for the company review. If the reason for the REO is to incorporate non-ROP renewable permit also send a hard copy of the letter, REO Working Draft and

Sec	REO Draft Staff Report to the DR(s). Contact Brian Carley to obtain the current DR contact information, if necessary. e. Email a copy to any other company contacts.
Sec	**5. MACES:** Update MACES in "Working Draft and Draft Staff Report Mailed to Applicant."
Staff	**6. Company Comments:** Review any company comments received. Comments from the company may be addressed by revisions to the REO Working Draft upon concurrence of district staff. Only comments that are relevant to the portion of the ROP that is reopened may be considered. If the company comments on other parts of the ROP that were not part of the REO, those comments cannot be acted upon. If the company and Department cannot agree on the conditions, do <u>not</u> incorporate the company's version of those conditions. Discuss these issues with the District Supervisor. Provide a discussion of the company's objections to those conditions in the Staff Report.
Sec	**7. File:** The Working Draft company review is a legal requirement, so a hard copy must be sent. File the 1) letter to the company, 2) REO Working Draft, and 3) REO Draft Staff Report together in the ROP folder.

III. REO Draft and 30-Day Public Comment Period

Staff **Sec** **Sec** **Sec**	**1. REO Draft:** a. If applicable, make appropriate changes to the REO Working Draft. b. Change the header from "{DATE} REO WORKING DRAFT" to "{DATE} REO DRAFT", including the first page. The date on the REO Draft is the date that starts the 30-day comment period, which is determined when the EGLE Calendar notice is published. c. Save the REO Draft as "**SRN REO Draft {MM-DD-YY}.docx**." The date used in the file name must be the start of the 30-day public comment period. d. Update the Table of Contents by either right clicking on the Table of Contents and choosing "Update field"/"update entire table" or pressing F9 and choosing "update entire table."
Staff **Sec** **Sec**	**2. Staff Report:** a. If applicable, make appropriate changes (e.g., company comments and district responses) to the draft Staff Report. b. Add the "Amended Date" on the cover page of the Staff Report and update the file name with REO and the new date (**SRN REO Staff Report {date}.docx**). Update the Table of Contents by either right clicking on the Table of Contents and choosing "Update field"/"update entire table" or pressing F9 and choosing "update entire table." c. Save the staff report as "**SRN REO Staff Report {MM-DD-YY}.docx**." The date on the Staff Report is the date that starts the 30-day comment period, which is determined when the EGLE Calendar notice is published. **Note**: The Staff Report is <u>not</u> changed once the 30-day public comment period commences. After the 30-day public comment period, any clarifications to the Staff Report must be made in a Staff Report Addendum.

Sec	**3. Letter to the company:** a. Create a letter to the RO regarding the 30-day public comment using **ROP Letter for Company WD Review, 30&45-Day Notice.dot**. You have the option of not sending a hard copy of the REO Draft, Staff Report and Public Notice to the company, but instead refer to the website for the documents. If the reason for the REO is to incorporate non-ROP renewable permit(s), also address the letter to the DR(s). Contact Brian Carley to coordinate the review period and/or to obtain the current DR contact information if necessary. **Sec** b. Save as **"SRN Letter with REO Draft.docx."** **Sec** c. Email a copy of the documents to any company contacts.
Staff/Sec	**4. Public Comment Period:** Decide on the start date for the public comment period. Make sure the 30-day public comment period will not end on a holiday or a weekend. Where applicable, coordinate with Brian Carley to synchronize the start and end dates with the public comment on Acid Rain permit(s). Consult the EGLE Calendar Production Schedule for the start date. (See T:\ADM\CALENDAR\{current year} Calendar Schedule.pdf). **Staff/Sec** a. Public Notice for EGLE Calendar i. Prepare a notice for the EGLE Calendar using **ROP PN EGLE Calendar Announcement.dot**. In the event that a hearing is scheduled, prepare a notice using **ROP PN EGLE Calendar Scheduled Public Hearing.dot** or **ROP PN EGLE Calendar Tentative Public Hearing.dot**. **Staff/Sec** ii. Save as **"SRN REO EGLE Calendar.docx."** **Sec** iii. Put notice into the EGLE Calendar Submission Form and post on the T Drive following the procedure in the "EGLE Calendar Notices Submittal Process" (ROP Manual 5.F). b. Public Notice Announcement **Sec** i. Prepare the public notice using **ROP PN Announcement for Reopening or Modification.dot**. Select the appropriate public hearing option in the template. **Sec** ii. Save as "**SRN REO Public Notice {MM-DD-YY of Draft ROP}.docx**." The public notice document is prepared for all REO Drafts including those that are not noticed in a newspaper. All notices must be posted on the AQD's "Recent Actions" webpage. (See Step 9 for further information.) c. Newspaper Notice (if necessary) **Sec** i. If it is necessary for the permit to be noticed in a newspaper, prepare the newspaper email using **ROP PN Newspaper Email Notification.dot**. **Sec** ii. For information regarding what newspaper to use and who to contact, go to T:PMT\Hearing\Newspaper**Newspaper Publication info.xlsx**. **Sec** iii. If you do not see a newspaper in the affected city or township on the list, you should contact the city or township in the affected area to see what newspaper they publish their public notices in and get a contact person to email. Add the contact information to the publication list or give the information to the AQD Permit Section Secretary and he/she will add it to the publication list. **Sec** iv. Save as **SRN REO Newspaper.docx**. **Sec** v. Make sure that the **ROP REO Public Notice Announcement** includes information about where and when the public hearing will be held if requested. **Sec** vi. After final approval from the District Supervisor, send the email to the newspaper and copy the AQD Administration Section (Lisa Rhyndress). Make sure to attach a copy of the word version of the public notice to this email. The email requests that a confirmation email and a tear sheet be returned from the newspaper, print for the facility file. If you do not hear from the newspaper call them for confirmation.

Sec	vii. Multiple REO Drafts for non-controversial sources located in the same geographic area may be noticed at the same time. Consolidation of several non-controversial sources may assist the district in expediting the public participation process. Hearings will only be held for those sources in the notice for which a hearing has specifically been requested.
Staff/Sec **Sec** **Sec**	d. Letter to Interested Parties (if appropriate) i. Based on experience with the public regarding the facility, some interested persons may want to be notified of the REO Draft. If this is the case, compile a mailing list and use this list throughout the public participation process. ii. Send a letter to those interested parties announcing the 30-day public comment period and explaining the permit process using **ROP PN Interested Party Letter.dot**. The letter will refer them to the AQD website to view the REO Draft and Staff Report or to contact the district office for a printed copy. Depending on the situation, you may choose to send copies with the letter. i. iii. Save as **SRN REO PN Interested Party Ltr.docx**.
Sec **Sec** **Sec**	**5. Prepare REO Draft packet:** a. Finalize the REO Draft ROP, Staff Report, Public Notice and Letter to RO/DR(s). (See Appendix G of the ROP Public Participation Procedures in the ROP Manual (5.A.)) b. Make sure the Staff Report date is the start of the 30-day public comment period. Add the appropriate dates to the "Public Comment Begins" and "Deadline for Public Comment" spaces in the General Information box on the first page. c. The packet should be put in this order: 1) Public Notice, 2) Staff Report, and 3) REO Draft. The notice is the first page and is printed single-sided, the rest of the packet is copied 2-sided.
Sec **Sec** **Sec**	**6. Send to alternate location:** Send a copy of the REO packet with a cover letter to any alternate location identified on the public notice as a location where the REO Draft can be reviewed. a. Prepare the letter using **ROP PN Local Authority Letter.dot**. b. Save as **"SRN REO Local Authority Letter.docx."**
Sec/FITT	**7. Posting on Internet FTP site:** Post the ROP application, REO Draft, Public Notice, and Staff Report on the FTP site. Make sure that all "track changes" in Word files have been accepted and saved properly before creating the PDF files. Also make sure the Draft ROP is password protected to prevent Track Changes from being disabled. (See FITT Procedures, ROP Manual 5.C.)
Sed	**8. MACES:** Update MACES ROP screen with the 30-day public comment start date under "Draft Permit – 30-Day Public Comment Period Start Date."
Sec **Sup**	**9. Email notification to EPA:** a. Prepare an email for EPA and any affected states (listed in Appendix A of the ROP Public Participation Procedures in the ROP Manual (5.A)) to inform them of the 30-day public comment period. Use **ROP EPA 30 Day Email Notification.dot** and save as **"SRN REO 30 Day Email.docx."** b. The supervisor forwards the email to EPA, any affected states, and others as follows: ➢ ogulei.david@epa.gov ➢ damico.genevieve@epa.gov ➢ reeson.isabelle@epa.gov ➢ myottb@michigan.gov ➢ brunnerj1@michigan.gov

Sec	➢ orentk@michigan.gov ➢ affected state(s) from Appendix A ➢ district permit writer ➢ district secretary c. File a copy of the notice in the yellow file folder. Note: This notice should include company name, SRN, and public comment period dates, and should be sent to the supervisor. To meet the public notice requirements, Kelly Orent is notified by copy of this email to post this "Recent Action" on the ROP webpage. If possible, notify Kelly a few days before the start of the 30-day period so she can have the update ready before the comment period begins. This notice also fulfills the legal requirement to notify affected states. EPA has agreed that whenever possible any comments will be provided during the 30-day comment period instead of waiting for the official 45-day review period. **AQD's agreement with EPA specifies that AQD will let EPA staff know if an ROP action is expected to be controversial or precedent-setting**. The notification should request that any comments be sent to the permit writer with a copy to the district supervisor(s) and Field Operations Manager.
Sec **Sec** **Sec**	**10. Mailing to company:** a. Send the hard copy letter and email to the Responsible Official(s). If the reason for the REO is to incorporate non-ROP renewable permit(s), also address the letter to the DR(s). Contact Brian Carley to coordinate the review period and/or to obtain the current DR contact information if necessary. b. Email a copy of the letter to any other company contacts. c. File a hard copy in the yellow ROP folder, and/or an electronic copy on the S drive.
Sec	**11. File:** File the Public Notice, 30-day email to EPA, Staff Report, REO Draft, company letter, and newspaper letter (if noticed in a newspaper) together in the ROP folder.
Staff/Sec **Sup** **Sec** **Sec**	**12. Preparing and holding a public hearing (if necessary):** a. If a hearing is necessary based on comments received, contact your supervisor to discuss procedures for setting up the hearing. See ROP Manual 5.D.1 for the public hearing checklist. See ROP Manual 5.D.3 for the "Process for ROP Public Hearing" to hand out at public hearings. b. Notify EPA and the company via email if a public hearing is to be held. c. If a hearing is not necessary, cancel the room if one has been reserved. d. Update MACES ROP screen with "Draft Permit - Date Public Hearing Held."
Staff **Staff** **Sec**	**13. Response to Comments:** In addition to comments from citizens, the company and/or affected states, informal comments may be submitted by EPA during the public comment period. These comments will be sent by EPA to the permit writer, Supervisor, Field Operations Manager, and Kelly Orent via email. a. After reviewing all comments, discuss with Supervisor. Document changes and why the changes were or were not made. Refer to **Appendix B** of the ROP Public Participation Procedures in the ROP Manual (5.A) for further guidance. b. Create a response to comments received in the Staff Report Addendum. c. File a record of all written comments and issues raised in the ROP Folder.

IV. REO Proposed and EPA 45-Day Review

	1. Prepare a REO Proposed:
Staff	a. If applicable, incorporate comments from the company, EPA, the public, and/or affected states. Only comments that are relevant to the portion of the ROP that is reopened may be considered. If the company comments on other parts of the ROP that were not part of the REO, those comments cannot be acted upon. If the permit writer does not agree with requested changes, do <u>not</u> incorporate the changes. Discuss these issues with the District Supervisor.
Sec	b. The document is now called a REO Proposed. Change the header on the ROP from "{DATE} REO DRAFT" to "{DATE} REO PROPOSED."
Sec	c. Save as "**SRN REO Proposed {MM-DD-YY}.docx.**"
	2. Prepare the Staff Report Addendum:
Staff/Sec	a. Do not change the original Staff Report. Develop an addendum to the existing Staff Report.
Staff	i. Open the Staff Report and click on the "Insert Addendum/Amendment/ Modification" button on the Toolbar and select "Reopening - Proposed."
Staff	ii. Provide a summary in the Staff Report Addendum of significant public comments, including any received by EPA, with each comment being addressed and resolved by AQD. Identify any changes made to the REO Draft in the addendum. Include any company objections to the REO Draft in the addendum.
Sec	iii. If no comments are received, generate a Staff Report Addendum that states no comments were received and no changes were made to the REO Draft.
Sec	b. Add the small letter in sequential order to the Staff Report Addendum to indicate that the Staff Report has been revised, e.g. MI-ROP-Z9999-2011a
Sec	c. Update the Table of Contents by either right clicking on the Table of Contents and choosing "Update field"/"update entire table" or pressing F9 and choosing "update entire table."
Sec	d. Save the Staff Report as "**SRN REO Staff Report {MM-DD-YY}.docx.**"
	3A. Letter to Company (if substantive changes were made to the REO Draft):
Staff	a. If substantive changes are made as a result of comments received during the public comment period, create a letter to the RO(s) using **<u>ROP Letter for Company WD Review, 30&45-Day Notice.dot</u>**. Use the template paragraph allowing the company 7 to 15 days to review the preliminary version of the REO Proposed and provide comments. Enclose a copy of the REO Proposed and the Draft Staff Report with the letter. If the reason for the REO is to incorporate a non-ROP renewable permit, copy the DR(s) on the letter.
Staff	b. Save the letter as **"SRN Letter with REO Proposed {MM-DD-YY}.docx."** (Use the date on the letter itself.)
Staff	c. If additional substantive comments related to the changes made are received from the company, repeat Steps III.1 and III.2 above.
Staff	d. Once the company understands the changes in the REO Proposed, create a letter to the RO(s)/DR(s) regarding the REO Proposed using **<u>ROP Letter for Company WD Review, 30&45-Day Notice.dot</u>**. Use the template paragraph indicating that the 45-day EPA review period has commenced and that the REO Proposed and Staff Report are available on the website. Do not send a hard copy of the REO Proposed or Staff Report. If the reason for the REO is to incorporate a non-ROP renewable permit, copy the DR and Brian Carley on the letter.
Sec	e. Email a copy of the documents to any company contacts.

Sec **Sec** **Sec**	**3B. Letter to Company (if no substantive changes were made to REO Draft):** a. Create a letter to the RO regarding the REO Proposed using **ROP Letter for Company Review, 30&45 Day Copy.dot**. Use the template paragraph indicating that the 45-day EPA review period has commenced and that the REO Proposed and Staff Report are available on the website. Do not send a hard copy of the REO Proposed or Staff Report. If the reason for the REO is to incorporate a non-ROP renewable permit, copy the DR(s) and Brian Carley on the letter. b. Save the letter as "**SRN Letter with REO Proposed {MM-DD-YY}.docx**." c. Email a copy of the documents to any company contacts.
Sec **Sec**	**4. Letter to interested parties:** a. If applicable, create a letter to all those interested parties on the original mailing list as well as those who made comments on the REO Draft, attended the public hearing, or expressed an interest during permit development. Use **ROP Letter to Interested Parties after 30 Day.dot**. This letter informs the public that the REO Proposed has gone to EPA for 45-day review and explains there is no opportunity for public comment during this review. The letter will refer them to the AQD website to view the REO Proposed and Staff Report or to contact the district office for a printed copy. b. Save the letter as "**SRN REO Letter to Interested Parties after 30 Day.docx"**
Sec	**5. Prepare the REO Proposed package:** Finalize the REO Proposed and the Staff Report. Make sure that the Staff Report Addendum date in the document and in the file name is the start of the 45-day EPA review period, which is the date that the supervisor emails the notice to EPA.
Sec/FITT	**6. Posting on Internet FTP site:** Post the REO Proposed and Staff Report on the FTP site. Also make sure the REO Proposed is password protected to prevent Track Changes from being disabled. (See FITT Procedures, ROP Manual 5.C.)
Sup **Sec** **Sup** **Sec**	**7. Initiate the 45-day EPA review period:** Notify EPA via email from the supervisor of the availability of the REO Proposed and Staff Report. If the documents are available on the FTP site, EPA considers the 45-day time clock as started upon the date that the District Supervisor sends the email notifying EPA that the REO Proposed and Staff Report are ready for review. The 45-day time clock does not start until the documents are all posted on the FTP site. a. Prepare the email using **ROP EPA 45 day Email Notification.dot**. b. Save as **"SRN REO 45 Day Email.docx."** c. The supervisor forwards the email to EPA and others as follows: ➢ ogulei.david@epa.gov ➢ damico.genevieve@epa.gov ➢ reeson.isabelle@epa.gov ➢ myottb@michigan.gov ➢ brunnerj1@michigan.gov ➢ orentk@michigan.gov (a copy of the email to Kelly is necessary to get the ROP notice posted on the "Recent Actions" website listing) ➢ district permit writer ➢ district secretary d. File a copy of the notice in the yellow file folder. Note: The 45-day review period starts the day EPA has received the 45-day email **and** has access to the uploaded REO Proposed and Staff Report, and will end in 45 days. If the ending date falls on a Holiday or weekend, use the date of the next business day.

Sec	**8. MACES:** Update MACES with the "Proposed Permit and Staff Report - EPA Review Start Date."
Sec	**9. File:** File a copy of 1) the email sent to EPA to start the 45-day review period, 2) REO Proposed, and 3) Staff Report together in the yellow folder.

V. REO Final

If EPA did not raise objections during the 45-day review period, the REO can be issued. If EPA objects to the issuance of the REO during the 45-day review period, Region 5 will initiate the process established in 40 CFR 70.8 (c).

Staff **Sec**	1. **Staff Report:** a. If EPA provides comments during the 45-day review period, add a second addendum to explain those comments and changes made to the REO. The date of the addendum is the REO issuance date. If no comments are received from EPA, do not add an addendum. b. Save the final Staff Report as "**SRN REO Staff Report {MM-DD-YY}.docx**." Whether or not another addendum is added, the REO Final issuance date is required in the Staff Report file name. (If this is not done, the file name gives the appearance that the Staff Report was not completed.)
Sec **Sec**	**2. Prepare the REO Final:** a. Delete the "Proposed" statements. On the ROP certification page, insert the *date of reopening approval* in the "Revision Date." If there were previous revisions, add the new date to the end of the string of dates. Make sure the small letter in sequential order has been added to the ROP, e.g. MI-ROP-Z9999-2011a and the Source-wide PTI if affected, e.g. MI-PTI-Z9999-2011a. The expiration date remains unchanged. b. Save the REO Final as "**SRN REO Final {MM-DD-YY}.docx**" using the final issuance date of the REO in the file name.
Sec **Sec**	**3. Approval Letter:** a. Create the approval letter to send to the RO using **ROP Reopening Issuance Letter.dot**. If the reason for the REO is to incorporate a non-ROP renewable permit, copy the DR(s) and Brian Carley on the letter. b. Save the letter as "**SRN REO Letter with Final.docx**."
Sec **Sec** **Sec/FITT**	**4. Prepare the REO Final package:** a. Finalize the REO, Staff Report and the approval letter and file the hard copy in a yellow folder. b. Make sure the REO Final is password protected to prevent Track Changes from being disabled for the next round of renewals. (See FITT Procedures, ROP Manual 5.C.) c. Post the REO and Staff Report on the FTP site.
Sec	**5. MACES:** Update MACES ROP screen with the "Permit-Effective Date."

	6. Mailings and notifications:
Sec	a. Send the approval letter to the RO(s) along with the REO Final. Include the Staff Report if a second addendum was added after the EPA 45-day review. If the reason for the REO is to incorporate a non-ROP renewable permit, copy the DR and Brian Carley on the letter.
Sec	b. Email a copy of the final cover letter to Sue Thelen and Kelly Orent to update the "Recent Actions" webpage.
Sec	c. If changes were made after the 45-day review period, create a letter using **ROP Letter to Interested Parties after 45 Day.dot** and send to all interested parties using the mailing list developed during the public comment process.
Sec	d. Save the letter as "**SRN REO Letter to Interested Parties after 45 Day.docx**."
Sec	e. Immediately email a copy of the documents to the company contact so they are aware that the permit revision is effective.
	Note: If a valid citizen petition is submitted within 60 days of the end of the EPA review period, EPA may direct EGLE to "reopen for cause" the ROP w/in 90 days, following the procedures in 40 CFR 70.7(g).

See the ROP Public Participation Procedures for the following:

Appendix A - List of Affected States
Appendix B - Handling Comments Received During Public Comment Period
Appendix C - Public Participation Procedures Check List
Appendix E - ROP Public Hearing Process Check List
Appendix F - Process for Renewable Operating Permit Public Hearing.
Appendix G - Formatting and Finalizing Check List

Reopening File Names Cheat Sheet

Note: A .dot extension indicates a template within Word. (A document created using the template is saved as a Word file with a .doc extension.) A .doc extension indicates an existing Word document.

Working Draft

TEMPLATE OR FILE NAME:	SAVE AS:
ROP Reopening Company Notification.dot	SRN REO ROP Company Notification
ROP Final {date}.doc	SRN REO Working Draft {**MM-DD-YY**}
ROP Staff Report {date of existing final}.doc	SRN REO Draft Staff Report {**MM-DD-YY** of working draft}
ROP Letter for Company WD Review, 30&45-Day Notice.dot	SRN REO Letter with Working Draft

30-Day Public Comment Period

TEMPLATE OR FILE NAME:	SAVE AS:
SRN Working Draft {date}.doc	SRN REO Draft {**MM-DD-YY**}
SRN Staff Report {date of working draft}.doc	SRN REO Staff Report {**MM-DD-YY** of draft}
SRN [Name of Plan].pdf	SRN [Name of Plan].pdf
ROP PN EGLE Calendar Announcement.dot	SRN REO EGLE Calendar
ROP PN Announcement.dot	SRN REO Public Notice {**MM-DD-YY** of draft}
ROP PN Newspaper Letter.dot	SRN REO Newspaper
ROP EPA 30 Day Email Notification.dot	SRN REO 30 Day Email
ROP Letter for Company WD Review, 30&45-Day Notice.dot	SRN REO Letter with Draft {**MM-DD-YY**}
ROP PN Local Authority Letter.dot	SRN REO Local Authority Letter
ROP PN Interested Party Ltr.dot	SRN REO PN Interested Party Letter

45-Day EPA Review

TEMPLATE OR FILE NAME:	SAVE AS:
SRN Draft {date}.doc	SRN REO Proposed {**MM-DD-YY**}
SRN Staff Report {date of draft}.doc	SRN REO Staff Report {**MM-DD-YY** of proposed}
SRN [Name of Plan].pdf	SRN [Name of Plan].pdf
ROP Letter for Company WD Review, 30&45-Day Notice.dot	SRN REO Letter with Proposed {**MM-DD-YY**}
ROP EPA 45 Day Email Notification.dot	SRN REO 45 Day Email
ROP Letter to Interested Parties after 30 Day.dot	SRN REO Letter to Interested Parties after 30 Day

Final ROP

TEMPLATE OR FILE NAME:	SAVE AS:
SRN Proposed {date}.doc	SRN REO Final {**MM-DD-YY**}
SRN Staff Report {date of proposed}.doc	SRN REO Staff Report {**MM-DD-YY** of final}
ROP Reopening Approval Letter.dot	SRN REO Letter with Final {**MM-DD-YY**}
ROP Letter to Interested Parties after 45 Day.dot	SRN REO Letter to Interested Parties after 45 Day