

Administrative Amendments (Rule 216(1)(a)(v)) – “Enhanced PTI”

Overview

Rule 216(1)(a)(v) specifies how to incorporate into the ROP the terms and conditions of a PTI if the PTI meets the following criteria:

- (1) the PTI process met the permit content requirements of Rule 213 (including monitoring, recordkeeping, and reporting);
- (2) the public participation and affected states’ review procedures were substantially equivalent to those required by Rule 214;
- (3) the source is in compliance with the terms and conditions of the PTI; and
- (4) no changes are required to the terms and conditions of the PTI. This includes a PTI for major modifications and Section 112(g) case-by-case MACT determinations that meet the specified criteria.

If the change does not meet the criteria, the application must be denied.

PROCEDURES	
	➤ AA5 Application Received
	1. Application Screening
	a. Application is date stamped and scanned.
	b. Verify that the applicant’s request for change meets the criteria. If the application does not meet the criteria, send a letter to the company (ROP Rev Denial Letter.dot and save as SRN AA5 Denial.doc on T:\FLD\ROP\ROP-MOD\MODIFICATIONS).
	c. Verify that the application is complete. If the application is incomplete, send an additional information letter to the company (ROP Rev Additional Info Letter.dot and save as SRN AA5 Additional Info.doc).
	2. MACES
	a. The application is logged in MACES as a new application. Write the application number from MACES on the paper application.
	3. Save Application
	a. The application SRN AA5 {Application No.} {MM-DD-YY}.pdf is uploaded to the ftp site.
	4. Notifications
	a. Within 5 days of receipt of a complete application, send an e-mail (ROP Rev Application Received E-mail.dot and save as SRN AA5 App Received {MM-DD-YY}.doc) to the District Supervisor and EPA that application has been received.
	➤ AA5 Proposed ROP and EPA 45-Day Review
	Within 60 days of receiving a complete application:
	1. Prepare Staff Report Addendum
	a. Create a Staff Report addendum by opening the existing final Staff Report and clicking on the “Insert Amendment/Modification” button on the Toolbar and selecting Admin Amend (1)(a)(v), Proposed. It is important to include appropriate detail regarding the change(s).
	b. Add the “Amended Date” on the cover page. The amended date is the date that the Staff Report is revised, which is the date that the AA5 Proposed ROP is sent for EPA review. If there is a previous amended date, add a comma and add the place holder for the new date.
	c. Update the Table of Contents and save the Staff Report as SRN Staff Report {MM-DD-YY of Proposed ROP}.doc .
	2. Prepare AA5 Proposed ROP
	a. Save SRN FINAL {MM-DD-YY}.doc (existing final ROP) from ftp site as SRN AA5 Proposed {MM-DD-YY}.doc .
	b. Add “{DATE} AA5 Proposed” to the center of the header of each page of the ROP, including the first page.

	c. Add the small letter in sequential order to the ROP number on the certification page to indicate that the ROP has been revised, e.g., MI-ROP-Z9999-2003a. Do likewise to the Source-wide PTI number, e.g., MI-PTI-Z9999-2003a.
	d. On the ROP certification page, insert "Revision Date: { <i>date of approval</i> }" on a new line between the "Effective Date" and "Expiration Date." Enter "Draft" as a place holder for the date because the amendment is not final until after EPA review.
	e. Make the appropriate or requested changes to the ROP. Do not forget to update related tables such as the Emission Unit Summary and Flexible Group Summary tables, and any related appendices including Appendix 6.
	f. Add the small letter in sequential order to the Source-Wide PTI number in the existing Appendix 6 paragraph, e.g., ...is being reissued as Source-Wide PTI number MI-PTI-Z9999-2003a.
	g. Update the Table of Contents and save the AA5 Proposed ROP.
	3. District Review
	a. Provide copy of the SM Working Draft ROP and Draft Staff Report to the appropriate District Supervisor and assigned district staff for review and comment. Incorporate changes as a result of that review.
	4. Company Review (Optional)
	a. Provide optional company review, if appropriate, by e-mailing the draft AA5 Proposed ROP and Staff Report to the company for comments (ROP Rev 7 Day Co Review E-mail.dot and save as SRN AA5 Company Review E-mail.doc).
	b. Make any changes to the AA5 Proposed ROP based on company comments.
	5. Company Letter with AA5 Proposed ROP
	a. Prepare a letter to the company (ROP Rev AA5, MM EPA Notice Letter.dot and save as SRN Letter with Proposed AA5.doc) regarding the 45-day EPA review period with a copy of the packet that is being proposed.
	6. Prepare AA5 Proposed ROP Package
	a. Send e-mail to the District Secretary that the AA5 Proposed ROP, Staff Report and letter to the company are ready to be finalized. The District Secretary/FITT Rep must make sure that all "track changes" in Word files have been accepted and saved properly before creating .pdf files. (Adobe will show the computer code that is still in the Word document but not showing in that view.)
	b. Upload the AA5 Proposed ROP and Staff Report to the ftp site.
	7. Mailings and Notifications
	a. Prepare an e-mail for EPA (ROP Rev EPA 45-Day Review E-mail.dot and save as SRN AA5 45 Day E-mail.doc).
	b. The Permit Writer should then forward the e-mail to EPA and others as follows: <ul style="list-style-type: none"> ➤ blathras.constantine@epa.gov ➤ damico.genevieve@epa.gov ➤ blanchard.brian@epa.gov ➤ myottb@michigan.gov ➤ orentk@michigan.gov ➤ District Supervisor ➤ Company Contact
	c. Print e-mail for file.
	d. The District Secretary sends the letter signed by District Supervisor to company. The District Secretary will print the Proposed ROP and staff report for the District file.
	8. MACES
	Update status in MACES with the start date of the 45-day EPA review under "Proposed Permit – Sent to EPA."
	➤ AA5 Final ROP
	The EPA has 45 days to review the proposed changes to the ROP. If no comments are received from the EPA or after the review period ends, the amended ROP can be issued. If comments are

	received, make any appropriate changes and include a description in the Staff Report addendum of the changes that were made.
	1. Prepare Final 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 ROP. Open the existing SRN Staff Report {MM-DD-YY of Proposed ROP}.doc and click on the “Insert Amendment/Modification” button on the Toolbar and select Admin Amend (1)(a)(v), Final. It is important to include appropriate detail regarding the comments/changes. If no comments are received from EPA, do not add another addendum.
	b. Update the Table of Contents and save the final Staff Report as SRN Staff Report {MM-DD-YY of Final ROP}.doc . Whether or not another addendum is added, the <u>final</u> ROP 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.)
	2. Prepare Final ROP
	a. Delete “{DATE} AA5 PROPOSED” from the header of the ROP. Do not change the effective date and expiration date. Issuance of the AA5 does not change the effective date and expiration date of the original ROP.
	b. On the ROP certification page, insert the <i>date of approval</i> in the “Revision Date.”
	c. Update the Table of Contents and save the final amended ROP as SRN Final {MM-DD-YY}.doc . The date in the file name is the same as the “Revision Date” on the ROP certification page.
	3. Prepare Approval Letter to Responsible Official
	Prepare the approval letter (ROP Rev AA5, MM, SM, SOM Approval Letter.dot , and save as SRN AA5 Approval {MM-DD-YY}.doc).
	4. Prepare Final ROP Package
	a. Send e-mail to the District Secretary that the amended ROP, Staff Report and approval letter are ready to be finalized. If changes were made to the ROP and/or Staff Report following EPA review, the District Secretary/FITT Rep must make sure that all “track changes” in Word files have been accepted and saved properly before creating .pdf files. The amended ROP must be put in Password Protect Track Changes.
	b. Upload the amended ROP and Staff Report to the ftp site.
	c. E-mail Kelly Orent to update the “Recent Actions” webpage.
	5. Mailings and Notifications
	a. The District Secretary sends the approval letter to the Responsible Official(s) along with the Staff Report and the amended ROP signed by District Supervisor. The District Secretary will notify the Permit Writer when the amended ROP is sent.
	b. E-mail a copy of the approval letter and the Internet address of the modified ROP to Sue Thelen of the Permit Section if a PTI has been incorporated via the AA5 process.
	6. MACES
	Update status in MACES with the issuance date under “Permit – Effective Date.” The Permit Writer will add a, b, c extension to the ROP permit number in MACES.
	7. File
	Send the hard copy amendment file to the District. The District Secretary will copy the final ROP and staff report for the District file.