Instructions for including an Acid Rain or CAIR Permit in an ROP Application

Because of the unique nature of how Title IV Acid Rain (AR) and Clean Air Interstate Rule (CAIR) permits are integrated into ROPs and the requirement that they must also be separately renewed as permits, special instructions have been developed to address these situations.

All AR and CAIR permits must be renewed in conjunction with the ROP process, simultaneously following the same formal review steps and allowing for the AR and/or CAIR permits to be readily incorporated into the ROP with the same expiration dates.

The ROP application itself will need to include information to request to add the AR and/or CAIR permit(s) into the ROP itself. If an ROP application was submitted prior to issuance of a CAIR permit, the ROP application must be updated to address the new applicable requirements.

Because any <u>existing</u> AR or CAIR permits will expire upon issuance of the ROP or ROP renewal, these need not be identified for deletion from an existing ROP when a renewal application is completed. Also, because the entire permit is incorporated into the ROP itself as an Appendix, the individual applicable requirements need not be separately identified on the ROP application forms. These special circumstances are reflected in the following instructions.

Also note that for all future AR permits, a permit number will be established and provided on that permit, using the protocol of MI-AR-{ORIS number}-{year of issuance}. All CAIR permits will be given a specific permit number using the protocol of MI-{kind of CAIR permit}-{ORIS number}-{year of issuance}. These numbers will be necessary to streamline completion of the ROP renewal application.

Instructions are provided for submitting the required information using the standard PASS-ROP software, as well separate instructions for using a paper version of the AR-001 form to update an ROP application that has already been submitted. However, applicants are strongly encouraged to use the PASS-ROP software for all ROP application actions to provide continuity and completeness of the source's ROP application database.

A. Instructions if using the PASS-ROP Software

Complete the appropriate S-001, EU-003, etc. forms as per standard instructions. Proceed to the AR-001 form.

> *"Operator's Applicable Requirement ID"* - Complete per standard instructions.

> *"Applicable Requirement Type"* - choose "Other"

> Answer the Consent Order/Consent Judgment question as appropriate

> *Applicable Requirement "Origin"* - Choose "Propose" to add the new or renewed AR or CAIR Permit.

> *"Underlying Applicable Requirement Citation"* - Enter "40 CFR Part 72" as the UAR for AR permits. For CAIR Permits, enter "40 CFR Part 97".

Applicable Requirement Status Verification

"Status Justification" - Provide a short description such as "Add new Acid Rain/CAIR Permit No. _____." Use the number given on the new permit itself. If the permit has not yet been issued, the correct number will be on the draft or proposed version of the permit.

"Proposed Applicable Requirement Text" - Provide language such as: "Include entire Acid Rain/CAIR Permit No. _____." Use the number given on the new permit itself. If the permit has not yet been issued, the correct number will be on the draft or proposed version of the permit.

Complete the remaining Items on the AR-001 form according to standard instructions.

B. Instructions if using paper copy to update an existing ROP application

Verify that the appropriate S-001, EU-003, etc. forms have been completed as per standard instructions. Proceed to a new AR-001 form.

Items 1 through 3 – Follow the standard instructions.

Item 4 – For "Applicable Requirement Type," choose the "Other" box.

Item 5 – Follow the standard instructions.

Item 6 – For "Applicable Requirement Identification," Check the "Add" box and continue to Item 7.

Item 7 – Enter "40 CFR Part 72" as the UAR for AR permits. For CAIR permits, enter "40 CFR Part 97."

Item 8 –
a. For justification, provide a short description such as "Add new Acid Rain/CAIR Permit No. __." Use the number given on the new permit itself. If the AR/CAIR permit has not yet been issued, the correct number will be on the draft or proposed version of the permit.

b. For proposed applicable requirement text, state "Include entire Acid Rain/CAIR Budget Permit No. _____." Use the number given on the new permit itself. If the AR/CAIR permit has not yet been issued, the correct number will be on the draft or proposed version of the permit.

Complete the remaining Items on the AR-001 form according to standard instructions.

NOTE: The AR-002, MS-001, MS-002 or MS-003 forms do <u>not</u> need be completed to apply to include an AR or a CAIR permit into an ROP.