

State Registration Number

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number

State Registration Number (SRN):

Located at

, , County, Michigan

Permit Number:

Staff Report Date:

[Spell out the date, e.g. January 1, 2023](#)

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) of the administrative rules promulgated under Act 451, requires that the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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State Registration Number

RENEWABLE OPERATING PERMIT

ROP Number

Delete the word **DRAFT** after company review and insert the 30-day start date of the public comment period. {Example: January 01, 2023}

DRAFT - STAFF REPORT

Blue text is guidance or notes on the use of the template. Delete all blue text when finished drafting the Staff Report.

Red text identifies options. Select the option that applies and change the text to black. Delete red text and option that does not apply.

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with an ROP pursuant to Title V of the federal Clean Air Act; and Michigan’s Administrative Rules for Air Pollution Control promulgated under Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source’s applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This Staff Report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft ROP terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft ROP pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	, Michigan
Source Registration Number (SRN):	
North American Industry Classification System (NAICS) Code:	
Number of Stationary Source Sections:	
Is Application for a Renewal or Initial Issuance?	{SELECT ONE}
Application Number:	
Responsible Official:	,
AQD Contact:	, {SELECT ONE}
Date Application Received:	
Date Application Was Administratively Complete:	
Is Application Shield in Effect?	{SELECT ONE}
Date Public Comment Begins:	
Deadline for Public Comment:	

Source Description

The following table lists stationary source emission information as reported to the Michigan Air Emissions Reporting System (MAERS) for the year .

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	
Lead (Pb)	
Nitrogen Oxides (NO _x)	
PM10*	
Sulfur Dioxide (SO ₂)	
Volatile Organic Compounds (VOCs)	

* Particulate matter (PM) that has an aerodynamic diameter less than or equal to a nominal 10 micrometers.

CHOOSE ONE

If the source is a major, synthetic minor, or demonstrating they are a minor source of HAPs, use the following table.

The following table lists Hazardous Air Pollutant emissions as calculated for the year by :

Individual Hazardous Air Pollutants (HAPs) **	Tons per Year
Total Hazardous Air Pollutants (HAPs)	

**As listed pursuant to Section 112(b) of the federal Clean Air Act.

OR

If the source is an area (as in true minor) source of HAPs, use the following sentence. This source is an area source of hazardous air pollutant (HAP) emissions pursuant to Section 112(b) of the federal Clean Air Act. No HAP emissions data is reported.

See Parts C and D in the ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are explained below in the Non-Applicable Requirement part of the Staff Report and identified in Part E of the ROP.

PICK ONE OR MORE OF THE FOLLOWING THREE OPTIONS CONCERNING ATTAINMENT STATUS. COMBINE OR STREAMLINE SENTENCES WHERE APPROPRIATE TO AVOID REDUNDANT WORDING.

The stationary source is in County, which is currently designated by the United States Environmental Protection Agency (USEPA) as attainment/unclassified for all criteria pollutants.

OR

County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the 8-hour ozone standard.

OR

The western portion of Allegan County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the 8-hour ozone standard.

OR

The western portion of Muskegon County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the 8-hour ozone standard.

AND/OR

County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the PM 2.5 standard.

AND/OR

A portion of Wayne County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the SO₂ standard.

OR

A portion of St. Clair County is currently designated by the United States Environmental Protection Agency (USEPA) as a non-attainment area with respect to the SO₂ standard.

The stationary source is subject to Title 40 of the Code of Federal Regulations (CFR) Part 70 because

PICK ONE OR MORE OF THE FOLLOWING FOUR OPTIONS. COMBINE OR STREAMLINE SENTENCES WHERE APPROPRIATE TO AVOID REDUNDANT WORDING.

the potential to emit of {SELECT ONE} exceeds 100 tons per year.

AND/OR

the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act is equal to or more than 10 tons per year and/or the potential to emit of all HAPs combined is equal to or more than 25 tons per year.

AND/OR

the source is subject to **40 CFR Part 60 / 62 / 63** {SELECT ALL THAT APPLY}, Subpart that requires a 40 CFR Part 70 permit.

IF THE SOURCE IS AN AREA/OPT OUT FOR HAPS, CHOOSE ONE OF THE FOLLOWING OPTIONS:

The stationary source is an area source of HAP emissions because the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act is less than 10 tons per year and the potential to emit of all HAPs combined are less than 25 tons per year.

OR

The stationary source is a “synthetic minor” source regarding HAP emissions because the stationary source accepted a legally enforceable permit condition limiting the potential to emit of any single HAP regulated by Section 112 of the federal Clean Air Act to less than 10 tons per year and the potential to emit of all HAPs combined to less than 25 tons per year.

INCLUDE THE FOLLOWING PARAGRAPH IF APPLICABLE

The owner/operator of _____ has requested removal of the provisions of the National Emission Standard for Hazardous Air Pollutants for _____ promulgated in 40 CFR Part 63, Subpart _____ with this ROP renewal. The stationary source accepted a legally enforceable permit condition limiting the potential to emit of HAPs to below major source thresholds.

PICK ONE OF THE FOUR FOLLOWING PARAGRAPHS REGARDING PSD

The stationary source is considered a “synthetic minor” source in regards to the Prevention of Significant Deterioration regulations of **PICK ONE OF THE FOLLOWING BASED ON UNDERLYING APPLICABLE REQUIREMENT AT TIME OF NSR PERMIT ISSUANCE:** {the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality **OR** 40 CFR 52.21} because the stationary source accepted legally enforceable permit conditions limiting the potential to emit of {SELECT ONE} to less than {SELECT ONE} tons per year. **(NOTE: USE 100 IF THE SOURCE IS ONE OF THE 28 CATEGORIES LISTED IN 40 CFR 52.21)**

OR

{LIST EU ID(s)} at the stationary source {SELECT ONE} subject to review under the Prevention of Significant Deterioration regulations of **PICK ONE OF THE FOLLOWING BASED ON UNDERLYING APPLICABLE REQUIREMENT AT TIME OF NSR PERMIT ISSUANCE:** {the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality **OR** 40 CFR 52.21} because at the time of New Source Review permitting the potential to emit of {SELECT ONE} was greater than {SELECT ONE} tons per year. **(NOTE: USE 100 IF THE SOURCES IS ONE OF THE 28 CATEGORIES LISTED IN 40 CFR 52.21)**

OR

No emission units at the stationary source were subject to the Prevention of Significant Deterioration regulations of the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality of Act 451 or 40 CFR 52.21 because at the time of New Source Review permitting the potential to emit of {SELECT ONE} was less than {SELECT ONE} tons per year. **(NOTE: USE 100 IF THE SOURCE IS ONE OF THE 28 CATEGORIES LISTED IN 40 CFR 52.21)**

OR

No emission units at the stationary source were subject to the Prevention of Significant Deterioration (PSD) regulations of the Michigan Air Pollution Control Rules Part 18, Prevention of Significant Deterioration of Air Quality and 40 CFR 52.21 because the process equipment was constructed/installed prior to June 19, 1978, the promulgation date of the PSD regulations.

CHOOSE ONE OF THE FOLLOWING TWO PARAGRAPHS IF THE SOURCE UNDERWENT OR AVOIDED PSD REVIEW FOR GREENHOUSE GASES:

IF THE SOURCE HAS BACT LIMITS FOR GHG:

The source has applicable requirements for Greenhouse Gases (GHG) as a result of review under the Prevention of Significant Deterioration regulations. These Best Available Control Technology (BACT) requirements for GHG are included in the ROP. The mandatory Greenhouse Gas Reporting Rule under 40 CFR Part 98 is not an ROP applicable requirement and is not referenced in the ROP.

OR

IF THE SOURCE IS A SYNTHETIC MINOR FOR GHG:

The stationary source has accepted legally enforceable synthetic minor limits for Greenhouse Gases (GHG) to avoid Prevention of Significant Deterioration (PSD) review as incorporated in Permit to Install

No. _____ and included in the ROP. A synthetic minor limit has been added to the ROP per Permit to Install No. _____.

INCLUDE ANY OF THE FOLLOWING THREE PARAGRAPHS IF APPLICABLE

The stationary source has {SELECT ONE} that {SELECT ONE} subject to **PICK ONE BASED ON THE UNDERLYING APPLICABLE REQUIREMENT AT THE TIME OF NSR PERMIT ISSUANCE: {the Michigan Air Pollution Control Rules Part 19, New Source Review for Major Sources Impacting Nonattainment Areas OR Rule 220 for Major Sources Impacting Nonattainment Areas}** at the time of New Source Review permitting.

{LIST EU ID(s)} {SELECT ONE} installed prior to August 15, 1967. As a result, this equipment is considered "grandfathered" and is not subject to New Source Review (NSR) permitting requirements.

Although {LIST EU ID(s)} {SELECT ONE} installed after August 15, 1967, this equipment was exempt from New Source Review (NSR) permitting requirements at the time it was installed.

ADD OTHERS SUCH AS BACT, PART 6 RULES, TOXICS REVIEW UNDER RULES 224/225, ETC. AS APPROPRIATE. ALSO, DISCUSS ANY SIGNIFICANT CHANGES FROM THE PREVIOUS ROP.

ADD THE FOLLOWING FOR NSPS-SUBJECT SOURCES

{LIST EU ID(s)} at the stationary source {SELECT ONE} subject to the Standards of Performance for promulgated in 40 CFR Part 60, Subparts A and _____.

ADD THE FOLLOWING FOR PART 61 NESHAP-SUBJECT SOURCES

{LIST EU ID(s)} at the stationary source {SELECT ONE} subject to the National Emission Standard for Hazardous Air Pollutants for _____ promulgated in 40 CFR Part 61, Subparts A and _____.

ADD THE FOLLOWING FOR MACT (Part 63 NESHAP)-SUBJECT SOURCES

{LIST EU ID(s)} at the stationary source {SELECT ONE} subject to the National Emission Standard for Hazardous Air Pollutants for _____ promulgated in 40 CFR Part 63, Subparts A and _____.

ADD THE FOLLOWING FOR MUNICIPAL SOLID WASTE LANDFILLS-SUBJECT SOURCES

{LIST EU ID(s)} at the stationary source {SELECT ONE} subject to the Standards of Performance for Municipal Solid Waste Landfills that commenced construction, reconstruction, or modification after July 17, 2014, promulgated in 40 CFR Part 60, Subparts A and XXX.

The stationary source is subject to the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills as promulgated in 40 CFR Part 63, Subparts A and AAAA. **The permittee has opted to comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the provisions in 40 CFR 63.1960 and 40 CFR 63.1961) for a Municipal Solid Waste Landfill with a gas collection and control system. The regulatory language in 40 CFR Part 60, Subpart XXX and 40 CFR Part 63, Subpart AAAA are similar but not identical. Where applicable, similar citations are grouped together.**

OR

The stationary source was subject to the Standards of Performance for Municipal Solid Waste Landfills promulgated in 40 CFR Part 60, Subparts A and WWW. On June 21, 2021, the facility became subject to the Federal Plan Requirements for Municipal Solid Waste Landfills that commenced construction on or before July 17, 2014, and have not been modified or reconstructed since July 17, 2014, as specified in 40 CFR Part 62, Subpart OOO. The stationary source is considered a legacy landfill under the Federal Plan. Michigan is not currently the delegated authority and is implementing and enforcing this regulation through the ROP.

The stationary source is subject to the National Emissions Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills as promulgated in 40 CFR Part 63, Subparts A and AAAA. **The permittee has opted to comply with the provisions for the operational standards in 40 CFR 63.1958 (as well as the provisions in 40 CFR 63.1960 and 40 CFR 63.1961) for a Municipal Solid Waste Landfill with a gas collection and control system. The regulatory language in 40 CFR Part 62, Subpart OOO and 40 CFR Part 63, Subpart AAAA are similar but not identical. Where applicable, similar citations are grouped together.**

ADD THE FOLLOWING LANGUAGE FOR AREA SOURCE MACT FOR WHICH WE ARE NOT DELEGATED.

{LIST EU ID(s)} at the stationary source {SELECT ONE} subject to the National Emissions Standards for Hazardous Air Pollutants for {name of the MACT} promulgated in 40 CFR Part 63, Subparts A and (Area Source MACT). **The ROP contains special conditions provided by {Company Name} in their application for applicable requirements from 40 CFR Part 63, Subpart . The AQD is not delegated the regulatory authority for this area source MACT.**

ADD THE FOLLOWING FOR ACID RAIN-SUBJECT SOURCES

{LIST EU ID(s)} at the stationary source {SELECT ONE} subject to the federal Acid Rain program promulgated in 40 CFR Part 72.

SELECT ALL OF THE FOLLOWING THAT APPLY TO CSAPR-SUBJECT SOURCES

{LIST EU ID(s)} at the stationary source {SELECT ONE} subject to the Cross-State Air Pollution Rule NO_x Annual Trading Program pursuant to 40 CFR Part 97, Subpart AAAAA.

{LIST EU ID(s)} at the stationary source {SELECT ONE} subject to the Cross-State Air Pollution Rule NO_x Ozone Season Group 3 Trading Program pursuant to 40 CFR Part 97, Subpart GGGGG.

{LIST EU ID(s)} at the stationary source {SELECT ONE} subject to the Cross-State Air Pollution Rule SO₂ Group 1 Trading Program pursuant to 40 CFR Part 97, Subpart CCCCC.

DISCUSS ANY ENFORCEMENT ISSUES SINCE THE LAST ROP ISSUANCE. INCLUDE SIGNIFICANT VNS, AS WELL AS ESCALATED ENFORCEMENT ACTION(S) AND WHETHER THERE IS A COMPLIANCE SCHEDULE INCLUDED IN APPENDIX 2 OF THE ROP. SEE STAFF REPORT INSTRUCTIONS FOR FURTHER INFORMATION.

ADD THE FOLLOWING PARAGRAPH IF RULE 287(2)(C) AND/OR RULE 290 TABLES WERE USED IN THE ROP. IF NOT, DELETE THIS PARAGRAPH

The AQD's Rules 287 and 290 were revised on December 20, 2016. FGRULE287(2)(c) and FGRULE290 are flexible group tables created for emission units subject to these rules. Emission units installed before December 20, 2016, can comply with the requirements of Rule 287 and Rule 290 in effect at the time of installation or modification as identified in the tables. However, emission units installed or modified on or after December 20, 2016, must comply with the requirements of the current rules as outlined in the tables.

ALWAYS INCLUDE

The monitoring conditions contained in the ROP are necessary to demonstrate compliance with all applicable requirements and are consistent with the "Procedure for Evaluating Periodic Monitoring Submittals."

THE FOLLOWING PARAGRAPHS ARE FOR CAM APPLICABILITY

"SIMPLE" SOURCE-WIDE CAM NONAPPLICABILITY. IF THE SOURCE HAS NO EMISSION LIMITATIONS SUBJECT TO CAM DUE TO 1) NO CONTROLS AND/OR 2) NO UNIT WITH POTENTIAL

PRE-CONTROL EMISSIONS AT MAJOR SOURCE LEVELS, USE THE FOLLOWING PARAGRAPH AND REMOVE THE REMAINING CAM PARAGRAPHS AND CAM TABLE.

No emission units have emission limitations or standards that are subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64, because all emission units at the stationary source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds. **FOR EMISSION UNITS WITH CONTROL, DESCRIBE THE CONTROL EQUIPMENT AND THE PRE-CONTROL EMISSIONS (AND HOW THEY WERE DETERMINED).**

IF THE SOURCE HAS AT LEAST ONE CONTROLLED UNIT SUBJECT TO CAM AND HAS ONE OR MORE CONTROLLED UNITS NOT SUBJECT TO CAM DUE TO POTENTIAL PRE-CONTROL EMISSIONS LESS THAN MAJOR SOURCE LEVELS, USE THE FOLLOWING PARAGRAPH AND CONSIDER THE REMAINING CAM PARAGRAPHS AND CAM TABLE.

{LIST EU ID(s)} does/do not have emission limitations or standards that {SELECT ONE} subject to the federal Compliance Assurance Monitoring rule pursuant to 40 CFR Part 64 because the unit(s) does/do not have potential pre-control emissions over the major source thresholds. **DESCRIBE THE CONTROL EQUIPMENT AND THE PRE-CONTROL EMISSIONS (AND HOW THEY WERE DETERMINED).**

“LIMIT SPECIFIC” CAM NONAPPLICABILITY (FOR POTENTIAL PRE-CONTROLLED UNIT EMISSIONS AT MAJOR SOURCE LEVELS). IF THE SOURCE HAS EMISSION LIMITATIONS OR STANDARDS EXEMPT FROM CAM, INCLUDE THE APPROPRIATE OPTION(S) FROM THE FIVE CHOICES BELOW. IF THE SOURCE HAS **NO OTHER EMISSION LIMITS OR STANDARDS SUBJECT TO CAM, REMOVE THE CAM TABLE (ONLY THESE SPECIFIED EMISSION LIMITS OR STANDARDS ARE EXEMPT. IF A UNIT IS ALSO SUBJECT TO OTHER EMISSION LIMITS OR STANDARDS, CAM STILL APPLIES TO THE NON-EXEMPT EMISSION LIMITS OR STANDARDS.**

IF CAM EXEMPT DUE TO NSPS OR MACT PROPOSED AFTER NOVEMBER 15, 1990

The emission limitation(s) or standard(s) for {LIST POLLUTANT(S)} at the stationary source with the underlying applicable requirement(s) of 40 CFR Part 60 / 62 / 63, {SELECT ALL THAT APPLY} Subpart , from {LIST EU ID(s)} {SELECT ONE} exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(i) because {LIST EMISSION LIMITATION(S) OR STANDARD(S)} meet(s) the CAM exemption for NSPS or MACT proposed after November 15, 1990.

IF CAM EXEMPT DUE TO ACID RAIN

The emission limitation(s) or standard(s) for {LIST POLLUTANT(S)} at the stationary source with the underlying applicable requirements of 40 CFR Part 72, Acid Rain Program, from {LIST EU ID(s)} {SELECT ONE} exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(iii) because {LIST EMISSION LIMITATION(S) OR STANDARD(S)} meet(s) the CAM exemption for Acid Rain monitoring requirements.

IF CAM EXEMPT DUE TO EMISSION TRADING (CSAPR)

The emission limitation(s) or standard(s) for {LIST POLLUTANT(S)} at the stationary source with the underlying applicable requirement(s) of 40 CFR Part 97, Subpart AAAAA, GGGGG, OR CCCCC from {LIST EU ID(s)} at the stationary source {SELECT ONE} exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(iv) because {LIST EMISSION LIMITATION(S) OR STANDARD(S)} apply solely under an emission trading program.

IF CAM EXEMPT DUE TO A CONTINUOUS COMPLIANCE DETERMINATION METHOD

The emission limitation(s) or standard(s) for {LIST EMISSION LIMITATION(S) OR STANDARD(S)} from {LIST EU ID(s)} at the stationary source {SELECT ONE} exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(1)(vi) because {LIST EMISSION LIMITATION(S) OR STANDARD(S)} meet(s) the CAM exemption for a continuous compliance determination method.

IF CAM EXEMPT DUE TO BACKUP UTILITY POWER EMISSION UNIT

{LIST EU ID(s)} at the stationary source {SELECT ONE} exempt from the federal Compliance Assurance Monitoring (CAM) regulation pursuant to 40 CFR 64.2(b)(2) because {LIST EU ID(s)} meet(s) the CAM exemption for a backup utility power emission unit.

IF CAM APPLIES TO ANY EMISSION LIMIT(S), USE THE TABLE BELOW FOR EACH EMISSION UNIT/FLEXIBLE GROUP WITH EMISSION LIMIT(S) SUBJECT TO CAM (EMISSION UNIT HAS A CONTROL DEVICE TO ACHIEVE COMPLIANCE WITH EMISSION LIMIT AND POTENTIAL PRE-CONTROL EMISSIONS OF THE POLLUTANT ARE GREATER THAN THE MAJOR SOURCE THRESHOLD LEVEL).

IF THE CAM PLAN HAS INCLUDED PRESUMPTIVELY ACCEPTABLE MONITORING (PAM, MONITORING FOR POLLUTANTS IN AN NSPS OR MACT PROMULGATED AFTER 11-15-90), USE THE TABLE BELOW FOR EACH EMISSION UNIT/FLEXIBLE GROUP WITH EMISSION LIMIT(S) SUBJECT TO CAM THAT INCLUDES PAM. CAM TEMPLATE LANGUAGE IS STILL NEEDED IN THE ROP. MONITORING LANGUAGE IN THE ROP SHOULD INCLUDE UNDERLYING APPLICABLE REQUIREMENTS FROM 40 CFR PART 64 AS WELL AS FROM THE NSPS OR MACT.

IF THERE ARE NO EMISSION LIMITS SUBJECT TO CAM, REMOVE THE TABLE BELOW

- LIST EACH POLLUTANT AND EMISSION LIMIT THAT IS SUBJECT TO CAM ON A SEPARATE LINE.
- IDENTIFY THE UARs FOR THE CAM-SUBJECT POLLUTANT EMISSION LIMIT.
- LIST THE CONTROL EQUIPMENT THAT APPLIES FOR THAT POLLUTANT.
- GIVE A BRIEF DESCRIPTION OF THE MONITORING FOR THAT CAM-SUBJECT POLLUTANT AND THE REASON(S) IT WAS CHOSEN. INCLUDE THE MONITORING RANGE.
- LIST THE EMISSION UNIT/FLEXIBLE GROUP THAT CONTAINS CAM LANGUAGE.
- TO BE CONSIDERED PRESUMPTIVELY ACCEPTABLE MONITORING (PAM) FOR CAM, THE MONITORING MUST BE FROM AN NSPS OR MACT (POST 11-15-90) AND MEET THE REQUIREMENTS. IF THIS IS TRUE, CHOOSE "YES". IF THIS IS NOT TRUE, CHOOSE "NO".

The following Emission Units/Flexible Groups are subject to CAM:

Emission Unit/Flexible group ID	Pollutant/ Emission Limit	UAR(s)	Control Equipment	Monitoring (Include Monitoring Range)	Emission Unit/Flexible Group for CAM	PAM? *
						No
						No
						No
						No

*Presumptively Acceptable Monitoring (PAM)

BRIEFLY SUMMARIZE THE CAM PLAN BELOW AND HOW THE CAM APPROACH ASSURES COMPLIANCE.

ALWAYS INCLUDE

Please refer to Parts B, C and D in the draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-Wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-Wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document.

FOR INITIAL STAFF REPORT DELETE THE FOLLOWING PARAGRAPH AND TABLE

The following table lists all individual PTIs that were incorporated into previous ROPs. PTIs issued after the effective date of ROP No. [Note: this should be the most recently issued ROP, not a revision. If any revisions have been done since ROP issuance, do not include the “a, b, c” sequential number here.] are identified in Appendix 6 of the ROP.

PTI Number			

* Process/equipment discontinued and/or dismantled. PTI not in the draft ROP. {PUT * BESIDE ANY PTI THIS APPLIES TO}

Streamlined/Subsumed Requirements

PICK ONE

The following table lists explanations of any streamlined/subsumed requirements included in the ROP pursuant to Rules 213(2) and 213(6). All subsumed requirements are enforceable under the streamlined requirement that subsumes them.

In the Streamlined Limit/Requirement column, list the regulatory citation(s) (underlying applicable requirements) and the actual limit(s) or requirement(s) that is/are the most stringent. In the Subsumed Limit/Requirement column, list the regulatory citation(s) (underlying applicable requirements) and the actual limit(s) or requirement(s) that is/are less stringent. In the Stringency Analysis column, include as much detail as necessary to explain why the streamlined limit/requirement is more stringent than the subsumed limit/requirement, considering different units of measurement, averaging times, etc. Alternatively, include all the items listed in the table below in a non-table format. For an example of the table, see the ROP Manual Tab 4.G, “Staff Guidance on Streamlined/Subsumed Requirements in ROPs.”

Emission Unit/Flexible Group ID	Condition Number	Streamlined Limit/Requirement	Subsumed Limit/Requirement	Stringency Analysis

OR

This ROP does not include any streamlined/subsumed requirements pursuant to Rules 213(2) and 213(6).

Non-applicable Requirements

Part E of the ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the ROP Application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the ROP pursuant to Rule 213(6)(a)(ii).

Processes Not in the Draft ROP

PICK ONE

The following table lists PTI exempt processes that were not included in the Draft ROP pursuant to Rule 212(4). These processes are not subject to any process-specific emission limits or standards.

Emission Unit ID	Description of Emission Unit	Rule 212(4) Citation	PTI Exemption Rule Citation

OR

There were no PTI exempt processes listed in the ROP Application pursuant to Rule 212(4) that were not included in the Draft ROP.

Draft ROP Terms/Conditions Not Agreed to by Applicant

PICK ONE

The following table lists terms and/or conditions of the draft ROP that the AQD and the applicant did not agree upon and outlines the applicant’s objections pursuant to Rule 214(2). The terms and conditions that the AQD believes are necessary to comply with the requirements of Rule 213 shall be incorporated into the ROP. {ALTERNATIVELY, A SHORT DESCRIPTION OF AQD’S RATIONALE FOR KEEPING THOSE CONDITIONS MIGHT BE INCLUDED WITHOUT USING THE TABLE FORMAT}

Emission Unit/ Flexible Group ID	Permit Term(s) and/or Condition(s) in Dispute	Applicant’s Objection

OR

This draft ROP does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

PICK ONE

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements at the time of issuance of the ROP except for requirements listed in Appendix 2. The table in Appendix 2 contains a Schedule of Compliance developed pursuant to Rule 119(a)(i). The applicant must adhere to this schedule and provide the required certified progress reports at least semiannually or in accordance with the schedule in the table. A Schedule of Compliance for any applicable requirement that the source is not in compliance with at the time of ROP issuance is supplemental to, and shall not sanction non-compliance with, the applicable requirements on which it is based.

OR

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by EGLE, AQD

The AQD proposes to approve this ROP. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the USEPA is allowed up to 45 days to review the draft ROP and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is _____, {SELECT ONE} District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the ROP Application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.