

University of Michigan Renewable Operating Permit Annual General Conditions Compliance Table January 1, 2022 through December 31, 2022			
General Conditions	Compliance Status		Method Used to Determine Compliance
	Continuous	Intermittent	
General Provisions			
GC 1: The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state-only" are not enforceable by the USEPA or citizens pursuant to the CAA	✓		All conditions are being met. Any deviations noted are attached.
GC 2: It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP.	✓		No enforcement issues occurred during this reporting period.
GC. 3: This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216	✓		All appropriate forms submitted. ROP renewal application was submitted October 2018.
GC 4: The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities: a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP. b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP. c. Inspect, at reasonable times, any of the following: i. Any stationary source. ii. Any emission unit. iii. Any equipment, including monitoring and air pollution control equipment. iv. Any work practices or operations regulated or required under the ROP. d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.	✓		All authorized representatives of the department with proper credentials are welcomed to visit the facility.
GC 5: The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq., and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality.	✓		All information requests are submitted within reasonable time.
GC 6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP.	✓		No challenges were addressed during this reporting period.
GC 7: The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451.	✓		The annual fee invoice is received and paid by UM.

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GC 8: This ROP does not convey any property rights or any exclusive privilege.	✓		The ROP is for UM air emission units only.
Equipment & Design			
GC 9: Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2).	✓		Monitored or inspected where applicable as required by specific permit conditions.
GC 10: Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law.	✓		Monitored or inspected where applicable as required by specific permit conditions.
Emission Limits			
GC 11: Unless otherwise specified in this ROP, the permittee shall comply with Rule 301, which states, in part, “Except as provided in subrules 2, 3, and 4 of this rule, a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of the following: a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity. b. A limit specified by an applicable federal new source performance standard. The grading of visible emissions shall be determined in accordance with Rule 303.	✓		Monitored or inspected where applicable as required by specific permit conditions.
GC 12: The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following: a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property. b. Unreasonable interference with the comfortable enjoyment of life and property.	✓		Monitored or inspected where applicable as required by specific permit conditions.
Testing/ Sampling			
GC 13: The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner’s or operator’s expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1).	✓		No tests have been requested per the department during this reporting period.
GC 14: Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003.	✓		
GC 15: Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test.	✓		
Monitoring/ Recordkeeping			
GC 16: Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate: a. The date, location, time, and method of sampling or measurements. b. The dates the analyses of the samples were performed. c. The company or entity that performed the analyses of the samples. d. The analytical techniques or methods used. e. The results of the analyses. f. The related process operating conditions or parameters that existed at the time of sampling or measurement.	✓		All records are kept on site with the emission unit and at EHS.

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GC 17: All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP.	✓		All records are kept on site with the emission unit.
Certification & Reporting			
GC 18: Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a Responsible Official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.	✓		Certification attached.
GC 19: A Responsible Official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604	✓		All annual certification reports are certified by the Responsible Official with Form 5736 and sent to the District Office and the EPA.
GC 20: The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP.	✓		Annual certification reports are submitted prior to March 15 for the reporting period of January 1 through December 31.
GC 21: The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP.	✓		NA
a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).	✓		No prompt reporting occurred during this reporting period.
b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.	✓		No prompt reporting occurred during this reporting period.
c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.		✓	See attached deviation report.

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<p>GC 22: For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following :</p> <p>a. Submitting a certification by a Responsible Official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.</p> <p>b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a Responsible Official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.</p>	✓		<p>A form 5736 is submitted with each report.</p> <p>No prompt reporting occurred during this reporting period.</p>
<p>GC 23: Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports</p>	✓		<p>The ROP renewal was issued August 6, 2021. Semi-annual reports are submitted prior to September 15 for the period of January 1 through June 30.</p>
<p>GC 24: On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department.</p>	✓		<p>The annual emissions report is due March 15th.</p>
<p>GC 25: The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a Responsible Official in a manner consistent with the CAA.</p>	✓		<p>No such conditions occurred during the previous year.</p>
Permit Shield			
<p>GC 26: Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied.</p> <p>a. The applicable requirements are included and are specifically identified in the ROP.</p> <p>b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.</p> <p>Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.</p>	✓		<p>Permit application was submitted and renewed according to the schedule.</p>
<p>GC 27: Nothing in this ROP shall alter or affect any of the following:</p> <p>a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA.</p> <p>b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance.</p> <p>c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA.</p> <p>d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA.</p>	✓		<p>UM follows the conditions listed in the ROP and shall not alter or affect any other provisions.</p>

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GC 28: The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following: a. Operational flexibility changes made pursuant to Rule 215. b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. d. Minor Permit Modifications made pursuant to Rule 216(2). e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department.	✓		ROP renewal application was submitted October 2018.
GC 29: Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action.	✓		ROP renewal application was submitted October 2018.
Revisions			
GC 30: For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215.	✓		The appropriate actions will be taken for all modification requests to the AQD.
GC 31: A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1).	✓		No changes in ownership.
GC 32: For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216.	✓		The appropriate actions will be taken for all modification requests to the AQD.
GC 33: Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable.	✓		No changes to the ROP during this reporting period.
Reopenings			
GC 34: A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances: a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements.			NA
Renewals			
GC 35: For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP.	✓		ROP renewal application was submitted October 2018. Renewal was issued August 6, 2021.
Stratospheric Ozone Protection			
GC 36: If the permittee is subject to 40 CFR Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F.	✓		The University of Michigan AC shop maintains records within regions and departments.

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GC 37: If the permittee is subject to 40 CFR Part 82 and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using HCFC-22 refrigerant.	✓		NA - Transportation Department does not fall under 40 CFR Part 82. Reviewed with General Counsel.
Risk Management Plan			
GC 38: If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall register and submit to the EPA the required data related to the risk management plan (RMP) for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under Part 68 do not limit in any way the general duty provisions under Section 112(r)(1).	—		NA
GC 39: If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall comply with the requirements of Part 68 no later than the latest of the following dates as provided in 68.10(a): a) June 21, 1999, b) Three years after the date on which a regulated substance is first listed under 68.130, or c) The date on which a regulated substance is first present above a threshold quantity.	—		
GC 40: If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR Part 68.	—		
GC 41: If subject to Section 112(r) of the CAA and 40 CFR Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r), as detailed in Conditions 28 and 29 of this RO Permit.	—		
Emissions Trading			
GC 42: Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216.	✓		UM is part of the Nox Budget Trading Program
Permit To Install (PTI)			
GC 43: The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.	✓		The appropriate actions will be taken for all modifications.
GC 44: The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.	✓		All air emission units operating according to PTIs.
GC 45: The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.	✓		The appropriate actions will be taken for all modifications.
GC 46: If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months of the original PTI issuance date, or has been interrupted for 18 months, the applicable terms and conditions from that PTI, as incorporated into the ROP, shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.	✓		No PTI applications submitted during this reporting period.