# REGULATORY IMPACT ANALYSIS

# FOR

# PART 64 COMPLIANCE ASSURANCE MONITORING REGULATION

**Innovative Strategies and Economics Group**

**Air Quality Strategies and Standards Division**

**Office of Air Quality Planning and Standards**
**Office of Air and Radiation**
**U.S. Environmental Protection Agency**
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# EXECUTIVE SUMMARY

The CAM program, as implemented through the part 64 regulations, responds to the statutory mandate in the Act. The 1990 Amendments contain several provisions directing the Agency to require owners or operators to conduct monitoring and to make compliance certifications. These provisions are set forth in title VII (enforcement provisions) of the Act.

EPA assumes as the baseline for its CAM analysis that affected emissions sources are currently in compliance with their underlying emission standards 100 percent of the time. Thus, there are no emissions reductions benefits (and health and welfare benefits), nor costs for additional control equipment technology, operation or maintenance, associated with CAM. EPA believes that some sources, in response to monitoring data gathered under CAM, may indeed have to make investments in control equipment technology, operation and maintenance to reduce emissions to comply with their underlying emissions standards; however, EPA believes these emissions reductions benefits and costs are not attributable to CAM — but to the underlying emissions standards. As such EPA has not estimated the benefits or costs that may result from such actions to reduce emissions.

EPA has estimated the cost of CAM to include only the cost of development and implementation of CAM plans, $50 million per year ($1995). This includes the cost of determining the monitoring approach and implementing the approved design, including reporting, recordkeeping and certification activities.

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