APPENDIX D

PART 64 IMPLEMENTATION SCHEDULE

D.1 §64.5(a) LARGE POLLUTANT POINTS

This analysis assumes that all initial permit applications required under part 70 will be filed by January 1999. For the 1/10 of part 64 affected sources which file an initial part 70 permit application after July 1998, submission of monitoring design criteria will accompany the permit application. The initial permit applications for these sources are assumed to be filed in January 1999. The permits for this group will be issued in a staggered fashion as allowed by §70.4(b)(ii) such that 1/3 of the sources in this group will be issued permits at each of the following dates: July 2000, July 2001 and July 2002. This schedule allows the permitting authority 18 months following submission of these permit applications to begin the issuance of permits. The date of permit issue starts the clock for the permit cycle and therefore establishes a date for permit renewal. Permit renewal dates need to be known because incremental part 64 costs will be incurred at renewal of the permit. With a 5 year permit cycle, a permit issued in July 2000 will need to be renewed in July 2005.[1] Corresponding timelines can be developed for sources with other issue dates.

For the remaining 9/10 of pollutant specific emission units at sources which have filed a part 70 permit application by July 1998 this analysis assumes that 2/3 of the units file a part 70 permit application prior to July 1997 and 1/3 of the units file after July 1997. Within the group that files by July 1997, all of these applications are assumed *complete* by July 1998. In addition, 2/3 of these sources are assumed to have been issued operating permits by July 1997. Specifically, within the group that has been issued a permit, 1/2 were issued their permit in January 1996 and 1/2 received their permit in January 1997. This means that these sources will be required to submit part 64 monitoring design criteria at the first significant permit revision or renewal, following part 64 promulgation. If no significant permit revisions occur which involve that pollutant point, monitoring design criteria must be submitted at permit renewal.

For the remaining 1/3 of sources that filed a part 70 application by July 1997 but were not *issued* a permit by July 1997, these sources will be issued operating permits in January 1998. Since the permits are assumed to be issued prior to July 1998, that is, prior to the date 180 days following expected part 64 promulgation, these sources will be required to submit monitoring design criteria at the first significant permit revision or renewal, whichever occurs first.

The group of sources that has not yet been considered is the group that submits their part 70 application after July 1997 but prior to July 1998. This group represents 2/9 of sources in the set of sources expected to be affected by part 64. As with the previous groups, it is necessary to identify which of these sources will have complete part 70 applications by July 1998 and the dates at which permits will be issued for these sources.

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[1] Sources that fall into this timeline will incur additional part 64 costs (related to renewal) on January 2005, that is six months prior to the actual renewal date.

For this group, 1/2 of the sources will have complete permit applications by July 1998. The permit issue dates for these sources will incorporate the three year stagger so that 1/3 of the group will be issued a permit at each of July 1999, July 2000, and July 2001. The language at §64.5(a)(2) indicates that these issue dates require submission of part 64 monitoring design criteria at the first significant permit revision or permit renewal, whichever occurs first.

The last subgroup to be considered is the group which submits a part 70 permit application after July 1997 but before July 1998 and whose permit application has not been determined to be complete prior to July 1998. This group represents 1/9 of all CAM sources. This analysis assumes that these applications are made in July 1998 with a supplement to the initial permit application made in January 1999 to incorporate part 64 requirements. One-third of this subgroup will be issued a permit by January 2000 with additional permits issued in January 2001 and January 2002 for each of the two remaining thirds.

D.2 §64.5(b) OTHER POLLUTANT POINTS

The implementation schedule for §64.5(b) Other pollutant points allows for delayed implementation. Specifically, part 64 monitoring design criteria are not required until the first permit renewal involving that pollutant point. The date of issuance of a part 70 permit for §64.5(b) Other pollutant points follows the schedule laid out above. Renewals of the initial permits will occur five years after the original permit issue date. Sources will incur costs related to permit renewal activities six months prior to the date of renewal.