

COMPLIANCE TIMELINE: PLYWOOD AND COMPOSITE WOOD PRODUCTS¹
Published on July 30, 2004 (69 FR 45944) and amended on February 16, 2006 (71 FR 8342)

Action	Existing Sources	Existing Sources in Low Risk Subcategory²	New Sources (Where Initial Startup is After January 9, 2003, but Before September 28, 2004)	New Sources (Where Initial Startup is on or After September 28, 2004)
Effective Date	September 28, 2004 (69 FR 45944)	September 28, 2004 (69 FR 45944)	September 28, 2004 (69 FR 45944)	September 28, 2004 (69 FR 45944)
Submit Initial Notification	January 26, 2005 (63.2280(b))	No later than January 26, 2005 (63.2280(b))	Submit Initial Notification no later than January 26, 2005 (63.2280(b)) Submit a Notification of Actual Date of Startup within 15 days of startup if this requirement becomes due on or after September 28, 2004. (63.9(b)(5))	Submit Initial Notification within 120 days after initial startup (63.2280(b)) Submit a Preconstruction Application to obtain approval to construct from the EPA Administrator before commencing construction. The Preconstruction Application may serve as an initial notification. (63.5(d)) Submit a Notification of Intent to Construct before Construction (63.9(b)(4) and (5)). Submit a Notification of Actual Date of Startup within 15 days of startup. (63.9(b)(4)(v))
Submit Low-Risk Demonstration	See next column	May be submitted at anytime, but must be part of the low-risk subcategory or otherwise in compliance with subpart DDDD by the October 1, 2008 MACT compliance date. (40 CFR, Part 63, Subpart DDDD, Appendix B) The Low-Risk Demonstration includes emission test results required by Appendix B	2	2

Submit Emission Averaging Plan (Optional)	October 1, 2007, or no later than 1 year before the date you would begin using an emissions average, whichever is later (63.2280(f))	Not Applicable	Not Applicable	Not Applicable
Complete and Maintain (On-Site) Startup, Shutdown, and Malfunction Plan	By October 1, 2008 (63.6(e)(3))	Not Applicable	By compliance date (see below) (63.6(e)(3))	By compliance date (see below) (63.6(e)(3))
Submit Routine Control Device Maintenance Exemption Request (Optional)	No later than September 1, 2008 (63.2280(e))	Not Applicable	No later than August 29, 2004 (see below) (63.2280(e))	No later than 30 days before initial startup (see below) (63.2280(e))
Requests for Extensions (Optional)	- Extensions for installing controls: By June 3, 2007 (63.6(i)(3)(B)) - Extensions for BACT/LAER early compliance: By January 26, 2005 (120 days after effective date) 63.6(i)(5)	Not Applicable	Not Applicable	Not Applicable
Compliance Date	October 1, 2008 (63.2233)	October 1, 2008 (63.2233)	September 28, 2004 (63.2233) If the rule is more stringent than a 112(g) or 112(j) case-by-case determination, the facility must comply within 8 years of the promulgation date (63.44(b)(1) and (2), 63.56(b))	Upon initial start-up (63.2233) If the rule is more stringent than a 112(g) or 112(j) case-by-case determination, the facility must comply within 8 years of the promulgation date (63.44(b)(1) and (2), 63.56(b))
Submit Notification of Intent to Conduct a Performance Test (If Applicable)	At least 60 days before the performance test is scheduled to begin (63.2280(c), 63.7(a) and (b), and 63.9(e))	Not Applicable	At least 60 days before the performance test is scheduled to begin (63.7(a) and (b), 63.9(e), and 63.2280(c))	At least 60 days before the performance test is scheduled to begin (63.7(a) and (b), 63.9(e), and 63.2280(c))

<p>Conduct Initial Performance Test <i>(If Applicable)</i></p>	<p>No later than March 29, 2009 (63.2261 and 63.7(a)(2))</p>	<p>Tests will need to be completed prior to submitting the low-risk demonstration</p>	<p>No later than March 27, 2005 (63.2261, and 63.7(a)(2))</p>	<p>No later than 180 days after initial start-up (63.2261, and 63.7(a)(2))</p>
<p>Submit Notification of Compliance Status</p>	<p>No later than 30 days from compliance demonstration that does not involve a performance test, or 60 days after completion of a performance test (63.2280(d), 63.9(h)(2)(ii))</p>	<p>Not required for facilities that demonstrate they are part of the low-risk subcategory. Test results are to be submitted with their low-risk demonstration.</p>	<p>No later than 30 days from compliance demonstration that does not involve a performance test, or 60 days after completion of a performance test (63.2280(d), 63.9(h)(2)(ii))</p>	<p>No later than 30 days from a compliance demonstration that does not involve a performance test, or 60 days after completion of a performance test (63.2280(d), 63.9(h)(2)(ii))</p>
<p>Submit Semiannual Compliance Reports</p>	<p>Submit 1st compliance report on July 31, 2009, and semiannually thereafter (63.2281(b)(1) through (3) or according to Title V semiannual reports (63.2281(b)(5))</p>	<p>Not Applicable</p>	<p>Submit 1st compliance report by July 31 or Jan 31 following first full 6 month period from start-up, and semiannually thereafter (63.2281(b)(1) through (3))</p>	<p>Submit 1st compliance report by July 31 or Jan 31 following first full 6 month period from start-up, and semiannually thereafter (63.2281(b)(1) through (3))</p>
<p>Other Notifications (e.g., Modifications or Replacement of Control System, Shutdown of Process Unit Included in Emissions Averaging Plan, or Change in Continuous Monitoring Parameters)(As Necessary)</p>	<p>Must submit notification to Administrator within 30 days before action (63.2280 and 63.9)</p>	<p>Certify with your annual title V permit compliance certification that the basis for your low-risk demonstration has not changed (13(a) in Appendix B to subpart DDDD)</p>	<p>Must submit notification to Administrator within 30 days before action (63.2280 and 63.9)</p>	<p>Must submit notification to Administrator within 30 days before action (63.2280 and 63.9)</p>
<p>Immediate Startup, Shutdown, and Malfunction Report</p>	<p>You must submit an immediate startup, shutdown, and malfunction report during the reporting period for an event that is not consistent with your startup, shutdown, and malfunction plan by fax or</p>	<p>Not Applicable</p>	<p>You must submit an immediate startup, shutdown, and malfunction report during the reporting period for an event that is not consistent with your startup, shutdown, and malfunction plan by fax or telephone within 2 working days of event, and by letter within 7 working days after the event unless alternative arrangements have been made with the</p>	<p>You must submit an immediate startup, shutdown, and malfunction report during the reporting period for an event that is not consistent with your startup, shutdown, and malfunction plan by fax or telephone within 2 working days of event, and by letter, within 7 working days after the event unless alternative</p>

	telephone within 2 working days of event, and by letter within 7 working days after the event unless alternative arrangements have been made with the permitting authority (40 CFR, Part 63, Subpart DDDD, Table 9)		permitting authority (40 CFR, Part 63, Subpart DDDD, Table 9)	arrangements have been made with the permitting authority (40 CFR, Part 63, Subpart DDDD, Table 9)
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1 - This timeline does not take into account special situations such as compliance extension/exemption requests. This table is not legally-binding and is not meant to replace the published regulation.

2 - New or reconstructed low-risk subcategory source compliance time-line requirements are specified, along with existing low-risk subcategory source compliance requirements, in 40 CFR, Part 63, Subpart DDDD, Appendix B.

An anonymous online feedback survey regarding this implementation tool is at:
<http://yosemite.epa.gov/oar/plywoodsurvey.nsf/survey1?openform>