

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

DATE: MAR 11, 1980

SUBJECT: Phased Permits for PSD

FROM: James B. Weigold, Chief New Source Review Office, SIB, CPDD

To: File

Dave Ullrich and Louise Gross of Region V called regarding a phased permit for the Patriot power plant. One question concerned how you apply the 18 month criteria -- if a source starts construction of the first phase within 18 months of receiving the permit, must it start the second phase 18 months later, the third 36 months later, etc. I advised that the first phase must start within 18 months (with some reasonable flexibility) and the later phases within 18 months of the date agreed to in the permit. Further, there could not be greater than 18 months between the completion of one phase and the start of the next. BACT gets reevaluated prior to each phase.

A second question concerned revising the start dates in the permit. Illinois Power is indicating to the Region that, because of revised projections of demand growth, construction may slip by a year or more on some or possibly all phases. The Region wanted to know what policy applies for reviewing such a request for permit revision. I said that it was always possible to review and modify a permit if the changes requested were reasonable; each case must be dealt with individually. However, a major departure (more than a few months) from the original permit requirements could provide grounds for reprocessing the entire application, including the imposition of a new application date (and the need to compete for available increment).

cc: P. Wyckoff
R. Biondi
W. Burch
R. Rhoads
D. Tyler
W. Barber
D. Ullrich
L. Gross
NSRO Staff