

# “Facility” vs. “Unit” retirements: Implementation issues

The 2014 Rule addresses application requirements for retiring facilities (as a whole), but appears silent in addressing retirements of one or more units within a given facility.

- Unit retirements may reduce actual flows to  $\ll$  125 MGD, but the regulatory definition of AIF may continue to trigger the application requirements of 40CFR 122.21(r)(9)-(13).
  - Does the Director have the authority to waive (r)(9)-(13)?
- Application info & study results may not be representative of retired unit conditions;
  - How might this impact the application and BTA analysis?