Implementation issues:

Training:

* EPA method 22 for fugitive emissions
* new grain loading and opacity standards
* Division 222 – layout and pointers to 224
* New Source Review –
  + applicability for all, detailed for senior permit writers
  + extensions
* Categorically insignificant activities
* Division 216 table
* Notice of Construction
* Excess emissions
* SSM and CMM – availability
* Reinstatement of Terminated Permit - unless the owner or operator submits the renewal application within three months of the permit expiration date. Clarify enforcement requirements
* GHG biomass ex-deferral

Tools

* SharePoint
  + permit writers manual
  + Source Sampling Manual
  + Continuous Monitoring Manual
  + EPA links
* IMDs
* AQ Guidance Database – update with new information (IMDs, lead permit writer and RMT meeting notes)

Permit templates

* Update all templates and application forms
* general permit for EGs
* update electrical power generation general permit
* new grain loading and opacity in all permits – how and when? (especially general permits)