1. **Emission Based Permitting Thresholds**
   - All Sources
   - Remove 50lbs/hr trigger AND/OR
   - Add something to 8.2 “notwithstanding the above” statement for low emissions

2. **Biosolids w/Particulate Limits**
   - (Sub 6) on Equipment w/Deminims Emissions
   - Related Issue

3. **Monitoring/Recordkeeping/Reporting (MMR) → None**
   - Why have a permit requirement if there is no associated MMR?

4. **Modify Sub 18 is potential to potential applicability determination**
   - Potential to Potential Applicability Option to be more like Federal NNSR App.
   - 2 Part Test like PSD would be more appropriate
   - SOTA Review is still Backstop

5. **Reporting Thresholds in other Rules in Sub 19, Sub 17, 16.6, 16.7, and 16.16 (lb./hr.)**
   - E.g. Coating Limits + Annual Limit
   - Even if a short term limit is triggered, sub chapter should not apply if operation is limited in hours or TPY or other similar parameter which would otherwise make control seem unreasonable.

6. **Portable Equipment**
   - Multiple Permits for some Equipment - discussion may have uncovered duplicative permits not really required.
   - Generators “Carb Registration”
   - Suggested Sticker Program similar to CARB program – register ALL generators

7. **Portable Equipment + Applicable Regulations**
   - E.g. NOx RACT (Boilers)
   - Is this covered in the Construction/Repair/Maintenance Guidance?
   - Do General Provisions in Title V permit allow for this?

8. **Replacement of Equipment on Emergency Basis (not just EGUs)**
   - Temporarily Housed Equipment
   - Rent a Boiler – only there until replacement boiler installed
   - Do General Provisions in Title V permit allow for this?

9. **Electronic Payment for Permits Prior to Permit Approval**
• e.g. Issue for Public Sector & Corporations (Bureaucracy)
• Cannot obtain GP/GOP until paid for

10. Procedure/Policy vs. Rule
• For Temporary Equipment/CRM
• Referenced Memo’s vs. Facility Letters
• Turbine Swaps
• Make Rule Determinations Available – Website – Searchable database – Applicability Determination Index
• For all of the above items, the group agreed there is a balancing act between consistency/flexibility and predictability/flexibility. If the Department were to codify many of the policies, it was agreed some degree of flexibility would be lost in the vein of consistency and predictability.

11. Definitions should be added to subchapters for the following equipment types:
• Portable Equipment
• Emergency Generators
• Temporary Equipment
• Construction Equipment
• What requirements would be placed on these types of equipment? Temporary by Nature?

12. Concurrent Public Comment and EPA Review for Title V Permits
• 30 Day + EPA 45 Day
• Other States/Regions do it (Why Not in NJ?)

13. For non–Bad Air Days
• Allow Demand Response
• Other States upwind allow for this, why penalize NJ facilities?

14. Renewable Energy Sources
• Out of state sources should meet NJ Environmental standards for Class I similar to how Class II RECs qualify
  OR
• Modified RACT Limits
  o Different from Commercial Limits
  o Compliance Similar to NSPS Limits
• Monitoring Frequency Issues

15. Implementation of Second Round of Transformation Initiatives
• Promoting Mutual Trust between Applicant and Permit Evaluator
• Mechanism or Procedure to Identify Permit Review Impasses Earlier and Initiate Common Sense Approaches to Resolve Impasses
• Distinguish between Technical Issues & Personality Issues

16. Monitoring Frequency
• Reduce stack test frequency for Low Utilization Equipment
• Stack Test at Variable Loading is not possible, so why do it? Allow higher limit?
• Daily Monitoring of Fuel for Large Sources but Used Low Frequency (i.e. Backup Boilers)
• Guidance is a starting point, not a minimum standard