Suggested Survey Questions/Topics for Upcoming OECA Training

1. **A general overview of OECA's authority in implementing air regulations includes, but is not limited to, the following questions. Select the topics of interest.**
    a. How is a rule enforced?
    b. Is there a general compliance checklist available?
    c. How does OECA determine which source categories to target for inspection?
    d. What happens when a facility is found in violation of a regulation?
    e. When is a notice of violation (NOV) issued? What steps are required to issue a NOV? How does OECA handle a permit deviation versus an emission standard violation? Who issues the NOV? When does the agency pursue a citation resulting from a NOV?
    f. What is enforcement discretion? When is it taken? Who has the authority to issue enforcement discretion?
    g. What role may a rule-writer play, if any, in the decision-making process for issuing a NOV or exercising enforcement discretion?
    h. Any additional topic(s)?

2. **Are you interested in OECA's statutory authority under the different sections (e.g., 111, 112, 129) of the CAA? Does its role change from section to section?**

3. **Are you interested in the latest guidance on SSM's impact on enforcement (e.g., malfunctions vs. limits apply at all times)?**

4. **Are you interested in the impacts of the Once-in-Always-in reversal? (Now referred to as MM2A)**

5. **Delegation - select the topics that interest you.**
    a. What are the impacts of using the incorrect delegated authority terminology in our regulatory text?
    b. How should the delegated authority be determined?
    c. Explain EPA's Delegations of Authority Manual, how it may be useful to rule writers and where it may be found?
    d. Case studies and examples
    e. Other topics?
6. **Applicability Determination (AD) - check the topics that interest you.**
    a. What is an AD, when is EPA required to issue an AD and who has the authority to do an AD?
    b. What is the procedure for doing an AD?
    c. What role does a rule writer play in applicability determinations?
    d. What is an AD Index (ADI) ?
    e. How ADs may impact future rulemakings

f. AD Process Lean
g. How is regulatory interpretation different from applicability determination?
h. Discuss 1999 AD and Alternative Monitoring Manual

7. **Do you want the training to include the following topics? Please select from the following options. You can select multiple options.**
   a. ICR Renewals
   b. Compliance assistance efforts that include a third party to be trained by OECA (e.g., Oil and Gas rule may employ a third party to oversee compliance)
   c. Request for alternative monitoring or site-specific monitoring. How to review an alternative monitoring request
   d. OECA's tips on writing better enforceable rules
   e. Specific training OECA conducts for rule implementation
   f. How the Regional Offices' enforcement authorities work with OECA to implement and enforce air regulations
   g. Any additional topic(s)?