



## **NACAA-ECOS-EPA SIP Reform Workgroup**

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# What I'll Cover

- ❑ What's the Problem?
- ❑ Mission of the NACAA-ECOS-EPA SIP Reform Workgroup
- ❑ Potential SIP Reforms and Examples of Progress to Date
- ❑ Other Workgroup Initiatives

# What's the Problem?

- ❑ What is a SIP?
  - ◆ SIP = State Implementation Plan
  - ◆ A “contract” between a state and EPA including enforceable measures the state has committed to adopt to implement Clean Air Act requirements
- ❑ Process for developing, submitting and approving SIPs is inefficient and outdated in many ways
- ❑ Critically important for SIPs to be developed and approved in a timely manner
- ❑ NACAA, ECOS and EPA decided to work together to address this long-standing problem
- ❑ Certainty in implementing these plans is key for regulators and for the regulated community
- ❑ We want to spend less time on process and more time on substantive action to clean up the air

# Mission of the NACAA-ECOS-EPA SIP Reform Workgroup

- ❑ Collaborative NACAA-ECOS-EPA initiative established in June 2010 to address long-standing SIP process issues
- ❑ Mission: “To make the SIP process more efficient and effective while ensuring the fulfillment of statutory responsibilities to attain the NAAQS as expeditiously as practicable”
- ❑ Agreed from outset to focus only on measures that do not require Clean Air Act changes
- ❑ Three main initiatives
  - 1) Potential SIP Reforms
  - 2) State-Local Toolkit
  - 3) Enhanced Federal Measures

# Workgroup Members

- Workgroup members include NACAA, ECOS and EPA representatives from

Sacramento, CA  
Linn County, IA  
Kentucky  
Maryland  
New Mexico

Nevada  
New York  
Ohio  
South Carolina  
Wisconsin

EPA HQ  
EPA Regions (III & VII)  
ECOS HQ  
NACAA HQ

# Potential SIP Reforms

- ❑ Workgroup discussed what SIP process improvements are necessary and achievable under the Clean Air Act
- ❑ Began with the 2005 recommendations of CAAAC's Air Quality Management Workgroup to transform the SIP process
- ❑ Also reviewed recommendations from states and localities and EPA HQ and regional staff
- ❑ Developed a list of the 13 highest-priority potential SIP process reforms

# Potential SIP Reforms – List of 13

- 1) Timely issuance of guidance
- 2) No unnecessary documentation for redesignation and maintenance plan submittals
- 3) Regional approaches to SIP planning
- 4) Increased use of WOE
- 5) Alignment of SIP submittal dates
- 6) Improved communications
- 7) Protocol/checklist for attainment SIP development
- 8) Letter approval for minor SIP revisions
- 9) Simplified reporting for innovative and voluntary measures
- 10) Training
- 11) State determination of how to seek public comment on SIP amendments
- 12) Electronic SIP submittals
- 13) Online database/tracker of approved SIPs and SIP submittals

# Potential SIP Reforms – Examples of Progress to Date

- ❑ Streamlined SIP submittal requirements
- ❑ More flexibility for states in determining how to notify and seek comments from the public on SIPs
- ❑ Increased understanding by EPA of states' need for timely guidance
- ❑ Online resource for tracking the status of SIPs: EPA's SIP Status & Information Website at [www.epa.gov/urbanair/sipstatus](http://www.epa.gov/urbanair/sipstatus)



# Other Workgroup Initiatives

- ❑ State Local Toolkit
  - ◆ Compilation of SIP “best practices” from across the country that have been demonstrated to reduce the time and resources historically associated with state and local SIP preparation and EPA approval.
- ❑ Example: SIP Kaizen Process (aka Lean SIP Process)
  - ◆ Reduce total time of the SIP process
  - ◆ Eliminate unnecessary process steps
  - ◆ Cut the number of decisions to be made along the way
  - ◆ Address the SIP backlog and avoid creating a future backlog

# Other Workgroup Initiatives (cont.)

- Enhanced Federal Measures
  - ◆ Pursue development and promulgation by EPA of effective federal measures to reduce ozone, particulate matter and their precursors; explore the viability of other national strategies from which states and localities could benefit.

# Questions?

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