



# **NACAA-ECOS-EPA SIP Reform Workgroup: Progress to Date**

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# What I'll Cover

- ❑ Background and Mission of the Workgroup
- ❑ Potential SIP Reforms
  - ◆ Key Issues
  - ◆ Progress to Date
- ❑ Next Steps

# Background and Mission of the 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 components
  - 1) Potential SIP Reforms
  - 2) State-Local Toolkit
  - 3) Enhanced Federal Measures

# Workgroup Members and Process

- Workgroup members include ECOS, NACAA and EPA representatives from

Sacramento, CA  
Linn County, IA  
Kentucky  
Maryland  
Nevada

New York  
Ohio  
South Carolina  
Utah→New Mexico  
Wisconsin

EPA HQ  
EPA Regions I, III & VII  
ECOS HQ  
NACAA HQ

- Process
  - ◆ Workgroup conference calls twice a month
  - ◆ Periodic updates for ECOS and NACAA members
  - ◆ Feedback sought from ECOS and NACAA members at key points

# Potential SIP Reforms

- Workgroup compiled prioritized list of 13 potential improvements to the SIP process based on recommendations from
  - ◆ CAAAC
  - ◆ States and localities
  - ◆ EPA HQ and regional staff
- Sought feedback on the list from ECOS and NACAA members

# 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 – Progress to Date

- ❑ Initiative represents a true collaborative partnership
- ❑ Discussions illuminate and heighten awareness of the challenges of SIP development, submittal and processing
- ❑ EPA is listening carefully to states and committed to being responsive
- ❑ Making headway on a number of issues
  - ◆ Increased opportunities for states to work with EPA as co-regulators
  - ◆ Acknowledgment of states' need for timely guidance
  - ◆ SIP Status & Information website at [www.epa.gov/urbanair/sipstatus](http://www.epa.gov/urbanair/sipstatus)
- ❑ EPA regions, working with OGC and OAR, have developed concrete solutions to two key issues

# Potential SIP Reforms – Progress to Date (cont.)

- ❑ Allow electronic submittal instead of multiple hard copies
  - Federal courts still require a paper docket, so EPA regions must receive **one** paper copy (but large data files can be submitted on disk) and an electronic copy. EPA is committed to working with DOJ to go paperless.
- ❑ Allow states to determine the most appropriate means for notifying and seeking comment from the public on SIP amendments
  - “Public notice” of SIP revisions is **media neutral**. State determines where to publicize, as long as public has “routine and ready access” to the selected publishing venues.
- ❑ EPA preparing a memo to transmit this and related info.



## Next Steps

- ❑ EPA OAR will transmit the memo to RAs in the next month. RAs will then transmit the memo, with a cover letter, to states.
- ❑ Continue to work on SIP process reform issues, including establishing a timeline for future work.
- ❑ Address remaining two components of our mission:
  - ◆ 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.
  - ◆ Enhanced Federal Measures – Pursue development and promulgation by EPA of rigorous federal measures to reduce ozone and PM and their precursors; explore the viability of other national strategies from which states and localities could benefit.

# Questions?

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