

Dear NACAA and ECOS Members,

This message and its attachments are in preparation for, and for use during, the special EPA/NACAA/ECOS conference call planned for Monday, August 6, from 12:30 to 2:00 PM EDT. On this call, we will solicit input on these documents and the collaborative process that they describe. Input can be given during the call, or through ECOS and NACAA staff by August 10, 2012.

The EPA/NACAA/ECOS SIP Reform Work Group is co-chaired by EPA (Carey Fitzmaurice), NACAA (Nancy Kruger), and ECOS (Jim Blizzard) and has state/local members from NY, MD, SC, KY, WI, OH, Cedar Rapids, NV, UT, and Sacramento. Under its Life Cycle Analysis Project (LCAP), the Work Group will focus on the totality of the NAAQS implementation process for the proposed 2012 PM NAAQS, including both the revised annual PM_{2.5} standard and the secondary PM standard based on a visibility index. EPA has brought additional staff from the Office of Air Quality Standards and Planning and EPA Regions 2 and 7 to the Work Group for this purpose, and will engage other EPA offices as needed for the project. The purpose of LCAP is to identify and complete helpful EPA guidance documents that promote consistent, efficient, and timely SIP submittals and to promote efficient and consistent SIP review actions by EPA. Lessons learned from this effort will be used to inform future NAAQS implementation efforts.

The purpose of this note is to provide you with our progress to date for your review and input. Collectively, we have developed several documents that identify the key engagement opportunities during implementation of the 2012 PM_{2.5} NAAQS and a process to operationalize the opportunities. What follows explains the materials we are providing for your review and how we anticipate using them.

1. What is the Big List? We are informally using the term “Big List” to refer to Attachment 1, *PM 2.5 Key Engagements Opportunities and Deliverables Needed for Successful Implementation of PM NAAQS*. This is a draft list of issues in the NAAQS implementation process, as identified by the SIP Reform Work Group, that need some level of interaction between the states and EPA to develop or improve products (such as an EPA rule or guidance document) or processes (such as resolution of consistency issues during EPA review of SIPs).
2. How was the Big List developed? The SIP Reform Work Group listed all the key actions and products that are needed in each stage of the NAAQS development and implementation lifecycle. This list was expanded to include critical products and engagements between state and EPA regulatory partners. These were then categorized as either “already exists and working well”, “already exists but could be improved”, “does not exist but is needed”, or “does not exist and is not needed”. Those categorized as “already exists but could be improved” or “does not exist but is needed” were consolidated into the attached Big List.

3. Why does the Big List include potential solutions and timing? The actions identified in the Big List as potential solutions are not intended to presuppose the solutions, but rather to prime thinking on a direction for addressing the need for the identified products or engagements. Timing is a critical component for successful implementation.
4. What is anticipated next? The presentation entitled *LCAP Process Moving Forward* (Attachment 2) includes a conceptual model for moving from the Big List to implementable work plans. When an issue/need item is identified as a priority for moving forward, a champion or champions would prepare a Process Planning Paper (see Attachment 3 for an example) as a resource for an in-depth discussion by an appropriate, topic-specific EPA/state group, and would convene that group. The latter group's output would be a detailed work plan (see Attachment 4 for an example). There may be multiple in-depth discussion groups in operation on different topics at one time, and/or discussion groups may address multiple topics in sequence. Some issues/needs may not have to advance to this planning process for some time, based on the timeline for developing and reviewing SIPs.
5. Then what? The responsible author/creator identified in the work plan will get to work. For example, this would be an EPA workgroup in the case of an EPA rule or guidance document. The work plan will identify planned interactions between EPA and states prior to finalization of the product.

If you have clarifying questions on these materials prior to the August 6 phone call, please do not hesitate to contact Tom Coda of EPA's Air Quality Policy Division at 919-541-3037 or coda.tom@epa.gov, Nancy Kruger at NACAA, or Jim Blizzard at ECOS.

Attachments

1. Key Engagements Opportunities and Deliverables Needed for Successful Implementation of the 2012 PM 2.5 PM NAAQS (A.K.A. Big List)
2. LCAP Process Going Forward (Power Point file)
3. Life-Cycle Analysis Project Straw Process Planning Paper on
4. Life-Cycle Analysis Project Straw Work Plan for Development of the PM SIP Requirements Rule