

NACAA-ECOS-EPA SIP Reform Workgroup

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Potential SIP Process Improvements

1. Assure that EPA guidance is issued in time for state and local agencies to use it in developing their plans.
2. *Facilitate redesignation and maintenance plan submittals by eliminating unnecessary documentation.
3. Develop and institute regional approaches to SIP planning. Such approaches would
 - include providing technical assistance and model rules so that adjoining states are not doing duplicative work and
 - allow for the submittal of one copy of technical documentation rather than requiring each state to develop state-specific documents.
4. Promote use of weight of evidence demonstrations for planning and implementation, relying less on modeling and more on monitoring and tracking progress.
5. To the extent possible, align SIP submittal dates for various pollutants.
 - Where possible, align schedules for new/revised NAAQS to facilitate transition to multi-pollutant air quality management.
 - Promote the selection of regulatory approaches and control strategies that maximize multi-pollutant cobenefits.
6. Improve communications. Programs are needed to
 - build support among constituencies,
 - make transparent actions that differ from the past,
 - ensure better interaction among EPA air divisions (e.g., to coordinate deadlines),
 - build trust among EPA headquarters, regions, states and local agencies and
 - share knowledge of successful SIP reforms.
7. Create a protocol/checklist for the development of attainment SIPs. This protocol/checklist would
 - provide for all parties to decide in advance the analyses and tools to be used in a SIP as well as what minimum requirements the SIP should contain and
 - incorporate a system for early EPA comment so that submitted plans are more likely to be approvable.
8. *Allow letter approval or certifications for minor SIP revisions. This would allow such minor revisions to be made quickly, avoiding the time-consuming requirements of *Federal Register* publication.
9. *Simplify the reporting process for innovative and voluntary measures.

10. Provide training that would
 - assist states developing nonattainment SIPs for the first time and
 - train EPA personnel to enable them to provide timely answers on SIP, MACT and NSPS questions and determinations.
11. Allow states to determine the most appropriate mechanisms for seeking comment from the public about SIP amendments (including whether or not to hold a hearing and the possibility of using online methods of notice).
12. Accept electronic SIP submittals instead of requiring multiple hard copies.
13. Create an online clearinghouse of approved SIPs and an online SIP-tracking database for SIP submittals.

** To enable the Workgroup to best address this issue, the Workgroup seeks specific examples of problems that illustrate the need for this improvement.*