



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

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# 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

# 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  
Wisconsin

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

- Process
  - ◆ Workgroup conference calls twice a month

# Identification of 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 (January 2011)

- 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

# Progress to Date

## □ Three EPA Memoranda

- ◆ *Regional Consistency for the Administrative Requirements of SIP Submittals and the Use of “Letter Notices”* (April 6, 2011)

<http://www.4cleanair.org/Documents/mccabeltrtoRAs6april11.pdf>

- ◆ *Guidelines for Preparing Letters Submitting SIPs to EPA and for Preparing Public Notices* (November 22, 2011)

<http://www.4cleanair.org/Documents/11222011McCabeWeberMemoGuidelines.pdf>

- ◆ *Options and Efficiency Tools for EPA Action on SIP Submittals* (October 31, 2011)

<http://www.4cleanair.org/Documents/FINALOptionsandEfficiencyToolsforEPAActiononSIPs103111.pdf>

## □ EPA Website

- ◆ SIP Status & Information Website

<http://www.epa.gov/airquality/urbanair/sipstatus/>

# Perspective of State-Local WG Members 18 Months into Process (Nov 2011)

- ❑ Appreciate EPA's commitment to making this a collaborative partnership
- ❑ Discussions illuminate and heighten awareness of the challenges of SIP development, submittal and processing
- ❑ In November, S-L WG members expressed to EPA that while discussions have been informative, WG efforts must become more active so we can achieve concrete, substantive progress to resolve fundamental problems that thwart S-L SIP efforts
- ❑ We need
  - ◆ Timely guidance and rules so S-Ls can develop and process SIPs and meet statutory deadlines
  - ◆ Consistency between EPA regions, particularly regarding how various aspects of the SIP process are addressed
  - ◆ Prioritization of responsibilities in the face of declining resources
  - ◆ Streamlined SIP requirements
  - ◆ More opportunities for S-Ls and EPA to work as partners from the inception of an initiative to develop guidance and rules

# Questions?

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