

MEMORANDUM

SUBJECT: 2015 Ozone SIP Planning Quick Start Guide

FROM: Anna Marie Wood, Director, Air Quality Policy Division,
Office of Air Quality Planning and Standards

TO: EPA Regional Air Division Directors
State and Local Air Directors

I am pleased to share with you a newly developed EPA resource to support state implementation plan (SIP) development and review. This resource, the Ozone Quick Start Guide or “Guide,” is intended to support air agencies in their development, and EPA in its review, of SIP submissions that respond to EPA’s Ozone State Implementation Requirements Rule (signed November 7, 2018).

A key principle of successful and efficient SIP planning and review is early engagement between air agencies and EPA. As you will see, the bulk of the Guide provides sample timelines for collaborations between EPA and air agencies to support the development of SIPs on which EPA can take timely action. The Guide was developed through recent efforts by EPA to employ lean management system tools and offers helpful information to support air agency and EPA activities in a manner that would enable compliance with applicable SIP planning deadlines and requirements.

The Guide is focused on efficient implementation of the SIP obligations associated with the 2015 8-hour ozone national ambient air quality standard (NAAQS). To that end, the Guide provides sample timelines for each year different SIP requirements are due for the 2015 ozone nonattainment areas. The timelines are intended to help air agencies develop SIPs upon which EPA can take timely action.

This Guide complements EPA’s efforts on ozone implementation but also on improving the SIP process. The Guide does not establish any legal requirements or obligations and serves only as a supporting tool to help air agencies and EPA in SIP development and review, in a manner consistent with ideas of streamlining and lean management systems. A key aspect of SIP process improvements is effective collaboration between air agencies and EPA, particularly through EPA’s regional offices. Regional offices and air agencies are encouraged to engage in conversations regarding the timelines included in the Guide as a planning tool to support the air quality goals of the Clean Air Act. EPA looks forward to continued collaboration with air agencies to ensure successful implementation of the 2015 8-hour ozone NAAQS.

We appreciate the support of air agencies as EPA employs a lean management system to improve our SIP process. We also appreciate the review and feedback from air agencies on this tool. This tool, among others to support ozone implementation, can be found on EPA’s

2015 ozone implementation website, <https://www.epa.gov/ground-level-ozone-pollution/implementation-2015-national-ambient-air-quality-standards-naaqs-ozone>. Related to SIP process improvements, EPA is in the early stages of developing a website where various SIP streamlining tools will be available (including, but not limited to, NAAQS-specific tools like the Guide). EPA intends to provide additional information about this website as it is further developed.

If you have any questions regarding this tool or EPA's SIP lean work, please do not hesitate to reach out to your EPA Regional Air Division Director or me at (919) 541-3604 or at wood.anna@epa.gov.

DRAFT 2015 Ozone NAAQS Quick Start Guide **For Early Engagement between EPA and Air Agencies**

This Checklist lays out a sample timeline of key milestones intended to help EPA and state and local air agencies collaborate early and throughout the SIP development process. Early engagement was identified as a critical component of a more efficient SIP process during the SIP Lean Kaizen event held in February 2018.

The Guide is set up as three tables – one for each year different SIP requirements are due (2020, 2021 and 2022) with reference to each other when the timing overlaps (color coded). What is listed below is intended to provide high level suggestions on timing and milestones. Regions are encouraged to use this checklist as a guide and should discuss target dates with air agencies to help air agencies submit approvable SIPs and help EPA act on those SIPs within the statutory timeframes. To the extent this timeline recommends submission of draft SIPs, in addition to the formal submittal, air agencies should use the State Plan Electronic Collaboration System or SPeCS for that purpose.

**Table 1. – Checklist for Requirements Due August 3, 2020:
Emissions Inventory, Emissions Statements (all areas)
and RACT (Moderate & higher)**

✓ Date Completed	Action	Responsible Person	Target Date	Appendix/ Recommendations
Emissions inventory and emission statements (all areas), RACT (Moderate and higher)				
SIP Assignment Subprocess				
	2015 Ozone Designations Effective Date		8/3/2018	
	Final SIP Requirements Rule Published		11/XX/2018	
	Assign SIP Lead.	Air Program Manager at EPA (APM)	Oct/Nov 2018	
	Initial Discussions for SIPs due August 2020 between Headquarters and Regions: Regions schedule call with OAQPS contact to review EACH nonattainment area and discuss expectations around control strategy and plan development challenges and opportunities.	SIP Lead at EPA	Dec 2018	
	Assign SIP Team (i.e., legal, modeling, inventory)	APM	Dec 2018	
SIP Preparation Subprocess				
	Conceptual Discussions with Air Agency: - Emissions inventory, emission statements, RACT (due August 2020)	SIP Lead(s)	Jan 2019	

	- Consider beginning discussions on control strategy and attainment demonstration modeling (due August 2021)			
	Ongoing Discussions: (i.e., Establish regular meetings as appropriate; Air agency submits pieces of SIP for informal review as they are completed.)	SIP Lead/Team and Air Agency	Jan 2019 – submittal of early draft	
	Agree on schedule for SIP development: SIP Team should work with air agencies to establish schedule based off of suggested timelines in this Guide.	SIP Lead/Team and Air Agency	March 2019	
	SIP Team: Determine if OAQPS and/or OGC should review draft in addition to SIP Team.	EPA HQ Point of Contact (POC) and SIP Lead	Prior to getting draft SIP for review	
	Early Engagement Draft Submitted: SIP Lead distributes to SIP Team to review.	Air Agency	August 2019 – March 2020 <u>Anticipated review time:</u> 30 days – most SIPs 60 days – more complex SIPs	One year prior to regulatory due date is a recommended target. Regions should negotiate with air agencies to establish a schedule: a - sooner for certification SIPs b – based on air agency’s regulatory adoption process if state needs to write a regulation (i.e., RACT) c – considering air agency resources.
	Identification of Approvability Issues: SIP Lead brief APM on any potential approvability issues identified by SIP Team and review written comments as necessary.	APM	Sept 2019- April 2020 (1-2 weeks before end of review time)	
	Feedback on Early Engagement Draft: SIP Lead provides comments to Air Agency and offers to set up conference call.	SIP Lead	Sept 2019– May 2020	
	Ongoing discussions (e.g., Discuss how Air Agency is addressing EPA comments, go over schedule.)	SIP Lead/Team and Air Agency		

	Reminder: Begin discussions for 2021 requirements, see Table 2: 15% ROP, NNSR, Attainment Demonstration, RACM, and Basic I/M (Moderate).		Dec 2019	
	Air Agency Public Comment Period Draft Submitted to EPA: SIP Lead distributes to SIP team for review for possible comment during comment period.	SIP Lead	Jan - May 2020 (2 weeks prior to publication)	Target dates negotiated based on SIP element complexity and/or air agency regulatory process.
	Air Agency Public Comment Period.	Air Agency	Jan – May 2020	Typically 30 days
	Air Agency Public Comment Period Identification of Approvability Issues: SIP Lead briefs APM on any issues, APM decides to comment on record or not.	APM	15 days prior to end of comment period	
	Air Agency Public Comment Period Feedback: SIP Lead gives Air Agency a head’s up, EPA comments on record as appropriate.	SIP Lead	June 2020 at the latest	
	Air Agency shares any substantive comments received during public comment period with EPA.	Air Agency	June – July 2020	
	Ongoing discussions regarding any changes to proposed SIP.	SIP Lead/Team and Air Agency	June – July 2020	
	Emissions inventory, emissions statements, RACT SIP(s) submitted to EPA	Air Agency	August 3, 2020	

**Table 2. – Checklist for Requirements Due August 3, 2021:
15% ROP, NNSR, Attainment Demonstration, RACM, and Basic I/M (Moderate)***

✓ Date Completed	Action	Responsible Person	Target Date	Appendix/ Recommendations
15% ROP, NNSR, Attainment Demonstration, RACM, and Basic I/M (Moderate)				
	Assign SIP Lead (if different)	APM	October 2019	
	Initial Discussions for Attainment Plans between Headquarters and Regions: Regions schedule call with OAQPS contact to review EACH nonattainment area and discuss expectations around control strategy and plan development challenges and opportunities.	SIP Lead	Dec 2019	
	Assign SIP Team (i.e., legal, modeling, inventory)	APM	Dec 2019	
SIP Preparation Subprocess				
	Conceptual Discussions with Air Agency: - 15% ROP, NNSR, other attainment plan elements required for Moderate areas (due August 2021). - Consider beginning discussions on control strategy and attainment demonstration modeling for Serious areas & above (due August 2022).	SIP Lead	Dec 2019	
	Ongoing Discussions: (i.e., Establish regular meetings as appropriate; Air agency submits pieces of SIP for informal review as they are completed.)	SIP Lead/Team and Air Agency	Jan 2020 – submittal of early draft	
	Agree on schedule for SIP development: SIP Team should work with air agencies to establish schedule based off of suggested timelines in this Guide.	SIP Lead/Team and Air Agency	March 2020	
	SIP Team: Determine if OAQPS or OGC should review draft in addition to SIP Team.	EPA HQ POC and SIP Lead	Prior to getting draft SIP for review	
	Early Engagement Draft Submitted: SIP Lead distributes to SIP team to review.	Air Agency	August 2020 – March 2021 <u>Anticipated review time:</u> 30 days – most SIPs 60 days – more complex SIPs	One year prior to regulatory due is a recommended target. Regions should negotiate with air agencies to establish a schedule:

				a - sooner for certification SIPs b – based on air agency’s regulatory adoption process if air agency needs to write a regulation c – considering air agency resources.
	Identification of Approvability Issues: SIP Lead brief APM on any potential approvability issues identified by SIP Team and review written comments as necessary.	APM	Sept 2020 – April 2021 (1-2 weeks before end of review time)	
	Feedback on Early Engagement Draft: SIP Lead provides comments to Air Agency and offers to set up conference call.	SIP Lead	Sept 2020 – May 2021	
	Ongoing discussion (e.g., Discuss how state is addressing EPA comments, go over schedule.)	SIP Lead/team and Air Agency		
	Reminder: Begin discussions for 2022 requirements, see Table 3: Attainment Plan, RFP with 3% reduction, Enhanced I/M (serious and higher).		Dec 2020	
	Air Agency Public Comment Period Draft Submitted to EPA: SIP Lead distributes to SIP team for review for possible comment during comment period.	SIP Lead	Jan - May 2021 (2 weeks prior to publication)	Target dates negotiated based on SIP element complexity and/or air agency reg process.
	Air Agency Public Comment Period.	Air Agency	Jan – May 2021	Typically 30 days
	Air Agency Public Comment Period Identification of Approvability Issues: SIP Lead briefs APM on any issues, APM decides to comment on record or not.	APM	15 days prior to end of comment period	
	Air Agency Public Comment Period Approvability Feedback: SIP Lead gives Air Agency a head’s up, EPA comments on record as appropriate.	SIP Lead	June 2021 at the latest	
	Air Agency shares any substantive comments received during public comment period with EPA.	Air Agency	June – July 2021	
	Ongoing discussion regarding any changes to proposed SIP.	SIP Lead/team and Air Agency	June – July 2021	
	15% ROP, NNSR, attainment plan (Moderate) SIP(s) submitted to EPA.	Air Agency	August 3, 2021	

* The new Lean SIP Process is planned to fully roll out in 2019, at which point this guide may be updated to reflect any additional changes.

Table 3. Checklist for Requirements Due August 3, 2022: Attainment Demonstrations, RFP Showing 3% Reduction, Enhanced Vehicle I/M (Serious and higher)*

✓ Date Completed	Action	Responsible Person	Target Date	Appendix/ Recommendations
Attainment demonstration SIPs and RACM, RFP's with 3% reduction, Enhanced I/M (serious and higher)				
	Assign SIP Lead (if different).	APM	October 2020	
	Initial Discussions for Attainment Plans between Headquarters and Regions: Regions schedule call with OAQPS contact to review EACH nonattainment area and discuss expectations around control strategy and plan development challenges and opportunities.	SIP Lead	Dec 2020	
	Assign SIP Team. (i.e., legal, modeling, inventory)	APM	Dec 2020	
SIP Preparation Subprocess				
	Conceptual Discussions with Air Agency: Attainment plan, RFP with 3% reduction, other attainment plan elements required for Serious areas and higher.	SIP Lead	Dec 2020	
	Ongoing Discussions: (i.e., Establish regular meetings as appropriate; Air agency submits pieces of SIP for informal review as they are completed.)	SIP Lead/Team and Air Agency	Jan 2021 – submittal of early draft	
	Agree on schedule for SIP development: SIP Team should work with air agencies to establish schedule based off of suggested timelines in this Guide.	SIP Lead/Team and Air Agency	March 2021	
	SIP Team: Determine if OAQPS or OGC should review draft in addition to SIP Team.	EPA HQ POC and SIP Lead	Prior to getting draft SIP for review	
	Early Engagement Draft Submitted: SIP Lead distributes to SIP team to review.	Air Agency	August 2021 – March 2022 <u>Anticipated review time:</u> 30 days – most SIPs	One year prior to regulatory due is a recommended target. Regions should negotiate with air agencies to establish a schedule:

			60 days – more complex SIPs	a - sooner for certification SIPs b – based on air agency’s regulatory adoption process if air agency needs to write a regulation c – considering air agency resources.
	Identification of Approvability Issues: SIP Lead brief APM on any potential approvability issues identified by SIP Team and review written comments as necessary.	APM	Sept 2021 – April 2022 (1-2 weeks before end of review time)	
	Feedback on Early Engagement Draft: SIP Lead provides comments to Air Agency and offers to set up conference call.	SIP Lead	Sept 2021 – May 2022	
	Ongoing discussion (e.g., Discuss how state is addressing EPA comments, go over schedule.)	SIP Lead/Team and Air Agency		
	Air Agency Public Comment Period Draft Submitted to EPA: SIP Lead distributes to SIP team for review for possible comment during comment period.		Jan - May 2022 (2 weeks prior to publication)	Target dates negotiated based on SIP element complexity and/or - air agency regulatory process.
	Air Agency Public Comment Period.	Air Agency	Jan – May 2022	Typically 30 days
	Air Agency Public Comment Period Identification of Approvability Issues: SIP Lead briefs APM on any issues, APM decides to comment on record or not.	APM	15 days from receipt of draft	
	Air Agency Public Comment Period Feedback: SIP lead gives Air Agency a head’s up, EPA comments on record as appropriate	SIP Lead	June 2022 at the latest	
	Air Agency shares any substantive comments received during public comment period with EPA.	Air Agency	June – July 2022	
	Ongoing discussion regarding any changes to proposed SIP.	SIP Lead/Team and Air Agency	June – July 2022	
	Attainment plan, RFP with 3% reduction (serious and higher) SIP(s) submitted to EPA.	Air Agency	August 3, 2022	

* The new Lean SIP Process is planned to fully roll out in 2019, at which point this guide may be updated to reflect any additional changes.

Appendix

Resources and Recommendations

[NOTE: REFERENCE UPDATES WILL OCCUR UPON RULE PUBLICATION]

State Plan Electronic Collaboration System or SPeCS:

- <https://www.epa.gov/air-quality-implementation-plans/submit-sips-online>

Resource References:

1. Resources:

Emissions inventory

- 83 FR xxx (2015 Ozone SIP Requirements Rule and note about relevant page numbers)
- 40 CFR 51.30(b)(3) and 40 CFR 51.1315
- <https://www.epa.gov/air-emissions-inventories/air-emissions-inventory-guidance-documents>

Emissions statements

- 83 FR xxx (2015 Ozone SIP Requirements Rule and note about relevant page numbers)
- <https://www.epa.gov/air-emissions-inventories/implementation-emission-statement-program>

RACT

- 83 FR xxx (2015 Ozone SRR and note about relevant page numbers)
- 40 CFR 51.1312
- <http://www.epa.gov/ttn/caaa/t1/memoranda/ractqanda.pdf>
- <https://www.epa.gov/ozone-pollution/control-techniques-guidelines-and-alternative-control-techniques-documents-reducing>

2. Resources: [Additional resources to added as appropriate]

Attainment plan with Reasonably Available Control Measures (RACTM), and attainment demonstration SIPs (moderate)

- 83 FR xxx (2015 Ozone SIP Requirements Rule and note about relevant page numbers)

Nonattainment NSR (NNSR) SIPs

- 83 FR xxx (2015 Ozone SIP Requirements Rule and note about relevant page numbers)

15% Reasonable Further Progress (6-year ROP/RFP) SIPs

- 83 FR xxx (2015 Ozone SIP Requirements Rule and note about relevant page numbers)

3. Resources: [Additional resources to added as appropriate]

Attainment plan with Reasonably Available Control Measures (RACM), and attainment demonstration SIPs (serious and higher)

- 83 FR xxx (2015 Ozone SIP Requirements Rule and note about relevant page numbers)

RFP SIPs showing an average of 3% reduction in emissions per year after the initial 6-year period

- 83 FR xxx (2015 Ozone SIP Requirements Rule and note about relevant page numbers)

**SIP Revisions and Due Dates for 2015 Ozone NAAQS Nonattainment Areas
(Designations Effective August 3, 2018)¹**

SIP Revisions Due August 3, 2020						
SIP	Marginal	Moderate	Serious	Severe	Extreme	OTR
Emissions Inventory	X	X	X	X	X	
Emission Statements	X	X	X	X	X	
VOC/NO _x RACT for Major/CTG Sources		X	X	X	X	X
VMT Growth Demonstration (and TCMs if needed)				X	X	
SIP Revisions Due August 3, 2021						
SIP	Marginal	Moderate	Serious	Severe	Extreme	OTR
Nonattainment NSR	X	X	X	X	X	
Attainment Demonstration, RACM and Contingency Measures		X				
15 percent ROP and Contingency Measures		X				
Basic I/M		X				
Clean Fuel for Boilers					X	
SIP Revision Due February 3, 2022 (If Applicable)						
SIP	Marginal	Moderate	Serious	Severe	Extreme	OTR
Clean-Fuel Vehicles Program (or Substitute Provisions)			X	X	X	
SIP Revisions Due August 3, 2022						
SIP	Marginal	Moderate	Serious	Severe	Extreme	OTR
Attainment Demonstration, RACM and Contingency Measures			X	X	X	
RFP and Contingency Measures			X	X	X	
Enhanced I/M			X	X	X	
SIP Revision Due August 3, 2028						
SIP	Marginal	Moderate	Serious	Severe	Extreme	OTR
Section 185 Penalty Fee Program				X	X	

¹ San Antonio, Texas designation effective September 24, 2018. Emissions Inventory and Emission Statements SIP revisions due September 24, 2020. Nonattainment NSR SIP revision due September 24, 2021.