



# National Implementation Assistance Ideas

## Reducing Emissions and State SIP Burdens

NACAA Spring Membership Meeting, May 19, 2010

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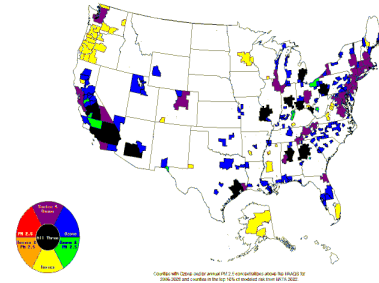
OAQPS/Outreach and Information Division

# Pieces of the Puzzle



- EPA has been working with states to test changes to the AQM and SIP processes.
  - *AQMP*: comprehensive multipollutant planning that would fold in consideration of activities affecting/affected by air quality (land use, transportation, energy, climate, environmental justice)
  - *CAPC*: performance-based approach to NAAQS implementation that could improve both the efficiency and effectiveness of the air quality planning process
  - *Lean/Kaizen*: tool used to identify SIP process inefficiencies; several lessons from the Reg. 7/states' use of Lean will be useful to the rest of the country
- EPA is looking for ways to further assist states and local areas with their planning efforts. We need your input regarding which ideas would be useful to you.
  - National Attainment SIP
  - Establishing presumptive RACT via rules and/or CTGs
  - Local reductions program
  - Ozone Resource Web site

# National Attainment SIP



- What would this entail?
  - EPA may be able to develop national attainment demonstrations that some states could incorporate by reference and approve through their state processes as their ozone attainment SIP.
- Who would it help?
  - Moderate areas that can attain with national measures alone, as shown by EPA or RPO modeling.
- How would it help?
  - Could alleviate states' modeling burden for these areas. Would also speed the EPA approval process once national rule is in place.
- What are the drawbacks?
  - Other nonattainment requirements (NSR, conformity) would still be required, and it is not clear how those might conflict with the national/regional modeling results.
- What information does EPA need from you?
  - Would your state want to use EPA modeling, RPO modeling, or its own modeling?
  - Would a national SIP rule help your state?



# Presumptive RACT Rules/CTGs

- What would this entail?
  - Presumptive RACT rules could establish RACT for a set of major sources. States could adopt these rules or use them as a basis to set their own RACT. EPA could also update or develop new Control Techniques Guidelines (CTGs) along with model rules for other source categories that are not covered by the presumptive RACT rules, but that are significant in particular regions.
- Who would it help?
  - May be useful to all nonattainment areas, especially new areas that do not have technical capabilities or much, if any, experience with the SIP process.
- How would it help?
  - Could facilitate states' efforts by providing EPA analysis of presumptive RACT. If states opt to adopt EPA's national RACT rule as RACT in their area, they could incorporate the national rule by reference rather than having to develop new rule language.
- What are the drawbacks?
  - We would need to move quickly to identify source categories, etc.--the extent to which we could get this in place in time for upcoming ozone SIPs is unclear.
  - If presumptive RACT is weak, states have the burden of explaining why a stronger level is appropriate in their area.
- What information does EPA need from you?
  - Would your state benefit from having presumptive RACT set by EPA via a rule or additional/updated CTGs?
  - If EPA heads in this direction, what source categories should we focus on first?



# Local reductions program

- What would this entail?
  - EPA could establish a program encouraging areas just above the standard to meet emission reduction milestones by implementation of early local measures. If early reductions are achieved, the state could request that EPA suspend planning requirements and redesignate the area to attainment.
- Who would it help?
  - Moderate or marginal ozone nonattainment areas
- How would it help?
  - If areas are able to come into attainment before the need to submit an attainment demonstration, they would save resources.
- What are the drawbacks?
  - The concept could be confused with the EAC program. The local reductions program would not defer designation, and requirements like conformity and NSR would still apply.
  - It's not clear whether states will feel there is enough incentive to participate.
- What information does EPA need from you?
  - If EPA develops this program, would you participate?
  - What kinds of regulatory and/or voluntary measures might you consider implementing if you were to participate a program like this?



# Ozone Resource Web site

- What would this entail?
  - EPA is developing a “one-stop-shop” information Web site where clean air partners can find regulatory and voluntary measures to assist in strategic ozone reduction planning efforts.
- Who would it help?
  - All nonattainment areas, as well as near-nonattainment areas that want ideas about how to reduce ozone in order to stay in attainment.
- What information does EPA need from you?
  - What types of information would you like to see on this site?
  - Who from your group can provide information to the Web site developers?

# What's Next



- May: Determine level of states' interest in EPA pursuing these concepts. Contact us!
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  - Attainment SIP and Presumptive RACT
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  - Ozone Resource Web site
    - Amy Gaskill (919) 541-1120, [gaskill.amy@epa.gov](mailto:gaskill.amy@epa.gov)
- May: Discuss with OGC and modelers to determine legal and technical limits.
- June: Seek OAR management approval of a set of options.
- Work with state and EPA staff to implement.