

Four State / EPA Region 7 State Implementation Plan (SIP) Kaizen Process



Why Do Kaizen Process for SIPs

“Transform the SIP process into a more dynamic and collaborative, performance oriented, multipollutant air quality management plan.”

Air Quality Management in the United States
National Research Council

Why Do Kaizen Process for SIPs?

- Duplicative Work
- Investment Time vs Environmental Results
- Past SIP Development and SIP Processing Performance

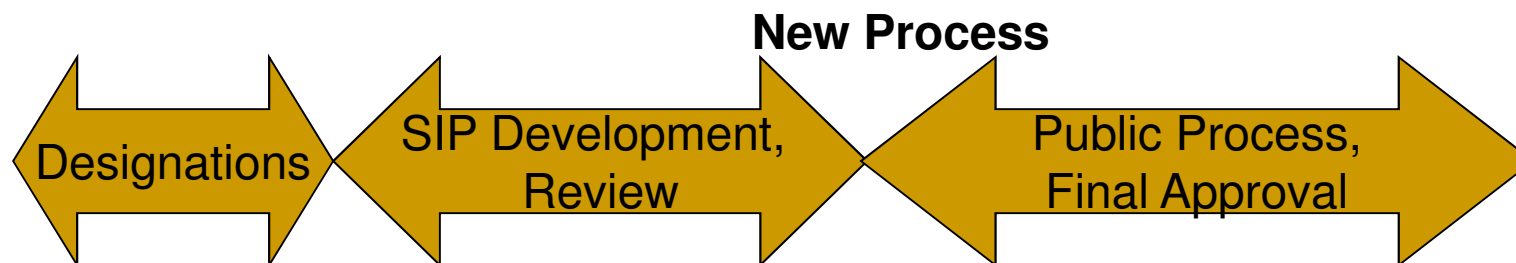
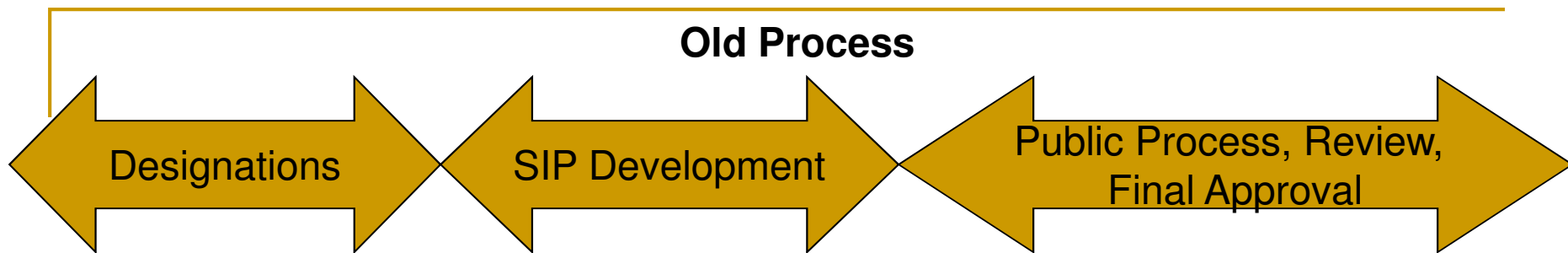
Goals of the Kaizen Event

1. 100% of approvable NAAQS SIPs occur within statutory timeframes.
2. SIPs of sufficient quality to be approvable on first pass.
3. Reduce processing time by 50%.
4. Eliminate 1/3 of SIP backlog each year for next 3 years.



Kaizen Future Process





- Early guidance
- Concurrent monitoring review
- Develop road map (including workshare)
- Early boundary agreement with HQ/Region/State (unofficial)

- RPO involvement
- Guidance on national measures, menu, SIP template
- State share “complete” draft SIPs
- HQ/Regions early involvement

- Final SIP 100% approvable
- Supplement SIP template
- Public comment process

Results of Kaizen Event

	Current SIP Process	New SIP Process	Percent Change
# of Steps	165	134	↓19%
# of Decisions	14	8	↓43%
Best Case: Delay Time	56 months (4.7 years)	13 months (1.1 years)	↓77%
Worst Case: Delay Time	96 months (8 years)	15 months (1.3 years)	↓84%
Process Time	Region 7: 340 days (0.9 years) EPA HQ: 1,080 days (3 years) State: 1,282 days (3.5 years) <u>Total</u> : 2,702 days (7.4 years)	1,181 days (3.2 years)	↓56%



Transferability

Key elements:

- ❑ Simultaneous guidance
- ❑ Timely Management Decisions
- ❑ SIP Templates
- ❑ SIP Roadmaps
- ❑ Efficient public process

Region specific elements:

- ❑ Work sharing
- ❑ RPO utilization
- ❑ Collaborative approach between states/region
- ❑ Willingness by all parties to work together on SIPs early

Questions?

Rick Brunetti, Director

Bureau of Air

Kansas Department of Health and Environment

rbrunetti@kdheks.gov

(785) 296-1593

Josh Tapp, Chief

Air Planning Branch

EPA Region 7

Tapp.joshua@epa.gov

(913) 551-7606



Workgroups: Tasks Going Forward

Workgroup	Goals	Timeframe
SIP roadmap	<ul style="list-style-type: none"> ■ Develop template plan ■ Hold roadmap meeting 	<ul style="list-style-type: none"> ■ 90 days ■ At promulgation of NAAQS
SIP template	<ul style="list-style-type: none"> ■ Create template ■ Feedback ■ Roll-out 	<ul style="list-style-type: none"> ■ 90 days ■ 120 days ■ At promulgation of NAAQS
Federal Register/public comment efficiencies	<ul style="list-style-type: none"> ■ Review/develop list of options to improve efficiencies ■ Review with state/select options 	<ul style="list-style-type: none"> ■ 90 days ■ After promulgation of NAAQS
Roll Out Plan	<ul style="list-style-type: none"> ■ Refine roll out plan, including action items, tracking system, schedule, etc. ■ Refine presentation for key audience ■ Schedule 30, 60, 90 day meetings 	<ul style="list-style-type: none"> ■ 30 days ■ As soon as possible

Workgroups: Tasks Going Forward

Workgroup	Goals	Timeframe
Federal measures (rules & tools)	<ul style="list-style-type: none"> ■ Identify tools ■ Explore rules ■ Implement use of tools/rules 	<ul style="list-style-type: none"> ■ 90 days ■ At/after promulgation of NAAQS
RPO tasks	<ul style="list-style-type: none"> ■ Determine RPO capabilities, resources and tasks ■ Finalize RPO involvement, get buy-in ■ Initiate RPO activities 	<ul style="list-style-type: none"> ■ 30 days ■ 90 – 120 days ■ At/after promulgation of NAAQS
Menu of control options	<ul style="list-style-type: none"> ■ Review existing control technologies ■ Evaluate new and innovative technologies ■ Provide menu of options to states 	<ul style="list-style-type: none"> ■ 30 days ■ 60 days ■ At/after promulgation of NAAQS

Process Changes

Action	HQ	R	S
Issue implementation rule and related guidance with NAAQS promulgation (if complete guidance can't be issued, identify key elements that states need to move forward and provide by memo)	X		
Initiate designation and SIP development process early in a collaborative process	X	X	X
Develop designation and SIP roadmap for each area (identify work share opportunities)		X	X
Joint session to agree on designation boundary	X	X	X
Early nod of approval from EPA on designation boundary	X	X	
Start SIP process early regardless of statutory timeframes (include legal and enforcement review at state level)			X
Utilize RPO for technical work for multi-state/multi-regions			X

Process Changes

Action	HQ	R	S
Develop SIP template, menu of control options, quantify emission reductions for national rules, evaluate rules that are regional/national in nature	X	X	
Develop draft whole SIP package that includes all pieces of a SIP. Share with EPA early, prior to public meetings.			X
Address all issues and comments at early draft stage so final document ready to go at submittal.	X	X	
Public comment strategy developed that includes options for efficient processes (e.g., direct final, parallel process)	X	X	X
Eliminate unnecessary documentation such as federal technical support documents as part of FR package, completeness letter, etc.		X	