

Worksheet on MANE-VU SIP

March 10, 2006--4th Draft

SIP Section	Documents/Appendices Referenced	Responsible Party/Parties	Status/Comments
Text of SIP Template in general		MARAMA	MARAMA to revise SIP template with help of team of state planners and in collaboration with other RPOs also working on similar documents. There are many documents or appendices referenced in the SIP Template. They are listed below by section of the Template. The organization responsible for producing these attachments is identified. Each state will need to assign a SIP planner to customize the SIP template to meet their needs.
1. Overview of requirements	<ul style="list-style-type: none"> • Contribution Assessment 	NESCAUM	We might want to reference all of our good work over the past 5 years including other reports and memos, our websites, data archives, inventories, etc... Possibly include a list
	Benefits of improved visibility	MARAMA	No appendix--discuss in general terms in text. MARAMA to update SIP template. Ann Acheson raised question of how to consider other AQRVs. May want to get FLM help on this part of SIP.
	<ul style="list-style-type: none"> • Summary of comments and responses on draft SIP 	States	This may be done on parts of the SIP as they go to hearing or out for public review. A final state hearing and response document may be added at end of process. Consider whether text needs to reference comments and responses at this point

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March 10, 2006--4th Draft

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2.Statement SIP adopted in accordance with state and federal rules	None. (Include in text)	State customize template	States need to be sure they have the legal authority to adopt requirements for the purpose of improving and protecting visibility in Class I areas affected by emissions within the state.

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March 10, 2006--4th Draft

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3.Description of MANE-VU and interstate consultation process	<ul style="list-style-type: none"> ●MANE-VU Interim Principles for Regional Planning 	OTC	Complete
	<ul style="list-style-type: none"> ●MANE-VU Long Range Strategy for Regional Haze Planning 	OTC in lead	Complete--updated annually
	<ul style="list-style-type: none"> ●Consultation Process document 	OTC	Complete
4.Description of consultation with FLMs	<ul style="list-style-type: none"> ●FLM comments and state responses 	FLMs & states	
5.Baseline and natural conditions estimates*	<ul style="list-style-type: none"> ●TSD on Baseline & Natural Conditions, including demonstration of adequate data for any Class I areas without monitors 	NESCAUM	The TSD has been prepared. NPS is revising the estimates for each area. Do we just need to modify SIP text? May want to reference briefing document (if any) prepared for May 2006 MANE-VU meeting?
	<ul style="list-style-type: none"> ●Summary of comments and responses on above 	MARAMA	
	Data used in determining baseline and natural visibility	MARAMA	Do not include all data. Just summary data, like annual dvs and site specific factors used. Revise text in SIP template

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6. Monitoring strategy*	<ul style="list-style-type: none"> ●2002: A Year in Review ●Updated Visibility Statistics for MANE-VU Region ●Review of Speciation Trends Network and IMPROVE Chemically Speciated Data ●RAIN Data Analysis (forthcoming) 	NESCAUM and MARAMA	MARAMA to revise text of SIP template. Text to constitute monitoring strategy for each Class I area, including annual reporting and recordkeeping procedures for assessing and reporting on visibility. Limit monitoring commitment to participation in IMPROVE to extent funding remains available and/or subject to annual network review. Perhaps includes statements supportive of RAIN type networks, but no commitments.
	<ul style="list-style-type: none"> ●Contribution assessment ●Pollution apportionment projection 	NESCAUM and MARAMA	MARAMA to revise text in SIP Template to refer to contribution assessment and pollution apportionment projection for procedures for determining the contribution of emissions from within the state to visibility at Class I areas in and outside the state.
7. Emissions inventory	●Statewide emissions inventory	State	This is baseline for showing progress in reducing emissions
	●MANE-VU emissions inventory	MARAMA	Modeling inventory used in visibility modeling.
8. BART			
a) BART-Eligible Sources	●List	State	This is complete except for NY and PA
b) BART Determinations	●Permits/Rules	States & NESCAUM	NESCAUM is helping states share information about this process
c) Analysis of visibility improvements achievable from BART controls*	●BART Resource Book modeling results	NESCAUM & states	This is part of the BART determination process
d) Alternatives to BART (optional trading program)	None anticipated at this time		No trading program is currently proposed.

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9.Reasonable Progress Goals*			
a)Uniform rate of progress	●Summary for each Class I Area	NESCAUM	
b)Reasonable progress goal	●White papers for control measures	OTC, NESCAUM, MARAMA	
	●Pollution apportionment projection	NESCAUM	
	●Summary assessment of statutory factors	MARAMA	
c)Comparison to progress from implementation of other CAA requirements	●Pollution apportionment projection	NESCAUM	Future baseline vs control measure assessment
d)Document consultation on Reasonable Progress Goals	●Minutes/summaries of meetings/calls, etc.	OTC & states?	
e)Commitment to 5-yr progress reports	None. (Include in text)	State customize template	

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10.Long Term Strategy			
•Document consultation on control measures	•Minutes/summaries of meetings/calls, etc.	OTC & states?	
•Identify state's share of emission reductions required to achieve reasonable progress	•Contribution Assessment	NESCAUM	
	•Pollution apportionment projection	NESCAUM	
•Technical basis for determination of emissions reductions needed	•Pollution apportionment projection	NESCAUM	
	•Memo quantifying benefits of long-term strategy	NESCAUM	
•Baseline inventory on which strategy is based	•2002 Emission inventory technical support document	MARAMA	
	•Future Emission inventory technical support document	MARAMA	
–Emissions reductions due to ongoing air pollution programs (list)	•List of control measures included in OTB/OTW emissions inventory	MARAMA	Be sure this list includes emissions reductions expected from the measures. (Probably has to be specified for each state individually.)

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–Measures to mitigate impacts of construction activities	•Technical support document on construction mitigation	MARAMA	States need to carefully review implications of listing specific regulations in TSD. Consider additional measure to require best practices.
–Emission limitations and schedules of compliance	•White papers on control measures, model rules	OTC, NESCAUM, MARAMA	
	•State permits and regulations	States	Public hearings required if new
–Source retirement and replacement schedules	•List	States, MARAMA	Should be consistent with emissions inventory used in modeling--will the NEEDS database satisfy this requirement?
–Agricultural and forestry smoke management	•Technical support document on smoke management	MARAMA	Draft out for comments
–Enforceability of emission limitations and control measures	None? (Include in text)	State customize template	
–Anticipated net effect on visibility resulting from projected changes to emissions	•Pollution apportionment projection	NESCAUM	

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11.State commitment to revising SIP by 7/31/18 and every 10 years thereafter	None	State customize template	
12.State commitment to appropriate action based on results of SIP review every 5 years	None	State customize template	