

Introduction to EPA's SIP Process Improvement Efforts

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Overview of EPA SIP Organization and SIP Process Improvement Efforts at EPA

- Introduction to EPA's Organization
- SIP Reform and NACAA-ECOS-EPA Commitments
- Progress on Reducing SIP Backlog
- PM_{2.5} Full Cycle Analysis Project (FCAP)
- SIP Tracking/Transparency Efforts
- Lean Efforts
- Questions/Comments/Discussion

EPA Region III Air Protection Division Organization



• **Air Protection Division Front Office** *Cristina Fernandez, Director* *David Arnold, Deputy*
Grants and Budget / Communications & Press / Records Management / FOIA

• **Office of Air Program Planning** *Brian Rehn, Acting*
SIPs / Mobile Sources / Conformity / Trading Programs / Transport / Regional Haze

• **Office of Permits & State Programs** *Linda Miller, Acting*
Title V / NSR & PSD / Clean Power Plan / Oil & Gas Permits / Toxics

• **Office of Air Monitoring & Analysis** *Alice Chow*
Modeling / Emissions Inventories / Monitoring / AQS

• **Office of Air Enforcement & Compliance Assistance** *Zelma Maldonado*
Compliance Inspections / CEMs / MACT / NESHAP / NSPS / PSD

• **Office of Air Partnership Programs** *Carol Febbo*
Clean Energy / Energy Efficiency / Ports / Radiation / Indoor Air / Burnwise / Climate



Organization Chart for EPA's Office of Air and Radiation (OAR)

Assistant Administrator Sarah Dunham, Acting
and Deputy Assistant Administrator Elizabeth Shaw

Office of Air Quality Planning and Standards

(OAQPS) Steve Page, Director Bill Harnett, AD Mike Koerber, AD

- Policy Analysis and Communications Staff
- Central Operations and Resources
- **Air Quality Assessment Division** Chet Wayland
- **Air Quality Policy Division** Anna Wood
- **Health & Environmental Impacts Division** Erika Sasser
- **Outreach and Information Division** Chebryll Edwards, Acting
- **Sector Policies and Programs Division** Peter Tsirigotis
- Washington Operations Staff

Office of Transportation and Air Quality

(OTAQ) Christopher Grundler, Director

- **Assessment and Standards Division** Bill Charmley
- **Compliance Division** Byron Bunker
- **Transportation and Climate Division** Karl Simon
- **Testing & Advanced Technology Division** David Haugen

Office of Atmospheric Programs (OAP)

Sara Dunham, Director

- **Clean Air Markets Division** Reid Harvey
- **Climate Protection Partnership Division** Carolyn Snyder
- **Stratospheric Protection Division** Drusilla Hufford
- **Climate Change Division** Paul Gunning

Office of Radiation and Indoor Air (ORIA)

Jonathan Edwards, Director

- **Program Management Office** Kia Logan
- **Indoor Environments Division** David Rowson
- **Radiation Protection Division** Jacqueline Werner
- **Radiation and Indoor Environments National Laboratory** Edward Wilds
- **National Analytical Radiation Environmental Laboratory** Dr. John Griggs

What We Do: Office of Air Quality Planning & Standards (OAQPS)



Primary mission: to preserve and improve air quality in the U.S.

To accomplish this, OAQPS:

- compiles and reviews air pollution data,
- develops pollution control regulations & guidance,
- assists states with monitoring & controlling air pollution,
- makes information available to the public, and
- reports to Congress the status of air pollution and reductions

Programs and projects managed by OAQPS:

- [AIRNow](#) - Air Quality Forecast
- [Air Quality Data and Tools](#)
- [Criteria Air Pollutants](#) (CO, O₃, Pb, NO_x, PM, SO₂)
- [Hazardous Air Pollutants](#)
- [Mercury and Air Toxics Standards](#)
- [Permitting Under the Clean Air Act](#)
- [Stationary Sources of Air Pollution](#)
- [Technical Air Pollution Resources](#)
- [Visibility and Regional Haze](#)

What We Do:

Office of Transportation and Air Quality (OTAQ)



Mission: to reduce air pollution from mobile sources and fuels, advance clean fuels and technology, and encourage practices and travel choices to minimize emissions.

OTAQ's primary activities include:

- Assess mobile source emissions & develop models
- Establish national emission standards for highway and nonroad mobile sources.
- Implement standards through certification process and in-use monitoring strategy.
- Develop fuel efficiency standards to reduce GHG emissions.
- Research, evaluate, and develop advanced technologies for controlling emissions.
- Develop strategies to improve fuel efficiency.

Programs and projects managed by OTAQ:

- [Cars and light trucks](#)
- [Clean Diesel Program](#)
- [Clean School Bus USA](#)
- [Diesel Fuel Standards](#)
- [Fuel economy](#)
- [Gasoline Standards](#)
- [Green Vehicle Guide](#)
- [Heavy trucks and buses](#)
- [Importing vehicles](#)
- [Modeling](#)
- [Motorcycles](#)
- [Nonroad engines, vehicles, equipment, and marine vessels](#)
- [Renewable Fuel Standard Program \(RFS\)](#)
- [SmartWay](#)
- [State and local transportation resources](#)
- [Transportation and climate](#)

What We Do:

Office of Atmospheric Programs (OAP)



Mission: to protect the ozone layer, address climate change, and improve regional air quality. OAP runs market based programs such as the Acid Rain Program and public/private partnership programs such as ENERGY STAR.

Programs and projects managed by OAP:

- [Acid rain](#)
- [Center for Corporate Climate Leadership](#)
- [Climate Change Indicators in the U.S.](#)
- [Combined Heat and Power Partnership](#)
- [Cross State Air Pollution Rule](#)
- [ENERGY STAR](#)
- [Global Methane Initiative](#)
- [Green Power Partnership](#)
- [GreenChill](#)
- [Greenhouse Gas Inventory, U.S.](#)
- [Greenhouse Gas Reporting Program](#)
- [Ozone Layer Protection](#)
- [Responsible Appliance Disposal \(RAD\) Program](#)
- [State and Local Climate and Energy Program](#)
- [UV Index](#)

What We Do:

Office of Radiation and Indoor Air (ORIA)



Mission: to protect the public and environment from the risks of radiation and indoor air pollution. The office coordinates with other federal, state, tribal, and non-governmental organizations to carry out its mission. ORIA develops criteria, standards, guidance, policies, and programs to limit unnecessary radiation exposure and control exposure to indoor air pollutants.

Programs and projects managed by ORIA:

- [Asthma](#)
- [Radiological Emergency Response](#)
- [Creating Healthy Indoor Air Quality in Schools](#)
- [Indoor Air Quality in Tribal Communities](#)
- [Indoor Air Quality](#)
- [Indoor airPLUS](#)
- [Mold and Moisture](#)
- [Radon](#)
- [Radiation](#)
- [RadNet](#)
- [RadTown](#)
- [Radiation Regulations and Laws](#)
- [Federal Guidance for Radiation Protection](#)
- [Smoke-free Homes](#)

Overview - How the SIP process works



**CAA or court order mandates plan submittal ,
or State decides to revise its SIP**



State prepares and adopts plan after public hearing



State submits SIP to EPA



EPA reviews SIP for completeness ... if complete, propose in FR



EPA approves/disapproves plan, after considering public comments



After SIP approval, the plan becomes Federally enforceable

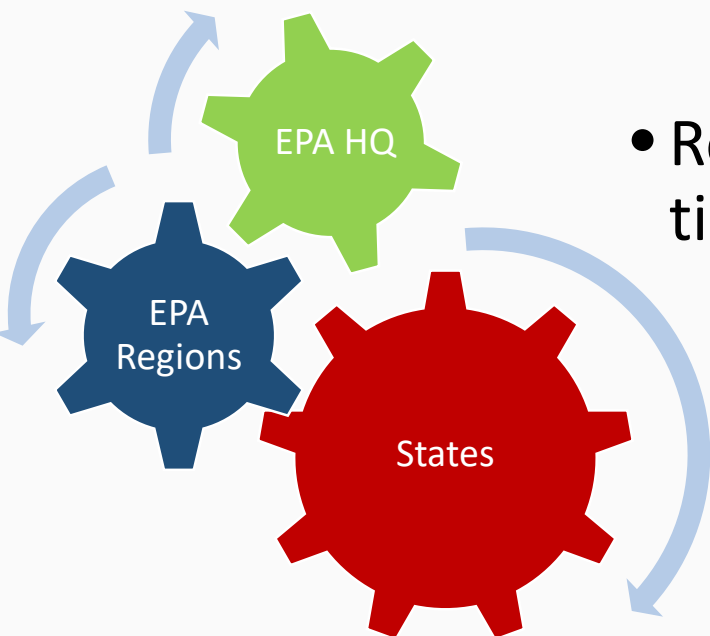


If SIP Federally mandated and disapproved ... then CAA penalties

SIP Reform Efforts



- Collaborative NACAA-ECOS-EPA initiative established in June 2010 to address long-standing SIP process issues. The Process for developing, submitting and ***approving SIPs was identified as inefficient and outdated***
- 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”



- Reduce the “SIP Backlog” – Consistent, timely and efficient SIP processing
- SIPs to be developed and ***approved in a consistent and timely manner***

NACAA-ECOS-EPA Commitments



- Clear the existing SIP backlog (as of Oct 2013) by Dec 2017
- Manage all other SIPs consistent with CAA deadlines
- EPA and States work together to identify impediments to timely processing
- Establish 4-year SIP management plans (between EPA Regions and states)
- Improve tracking of SIP progress
- Improve transparency of SIP processing within EPA
- Periodically review progress in backlog reduction
- Follow best practices

SIP Reform Workgroup Identified Issues



- 1) Timely issuance of guidance
- 2) Reduction of unnecessary documentation for redesignation/maintenance plan submittals
- 3) Regional approaches to SIP planning
- 4) Increased use of “Weight Of Evidence”
- 5) Alignment of SIP submittal dates
- 6) Improved communications between EPA and states
- 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

Target Schedule for NAAQS Implementation Rules/Guidance/Tools



Action	After NAAQS Promulgation
EPA issues PSD guidance or rule*	Upon promulgation (for necessary PSD measures)**
EPA issues Designations guidance	4 months
<i>States submit Designation recommendations</i>	<i>1 year</i>
EPA issues Infrastructure SIP guidance and/or Transport Rule	Up to 1 year
EPA issues proposed nonattainment area SIP rules or guidance	1 year
EPA finalizes designations (and classifications where appropriate)	2 years***
EPA issues NSR and/or conformity rule/guidance if needed	2 years***
EPA issues final nonattainment area SIP rules or guidance (including emission inventory, modeling guidance, and nonattainment NSR provisions)	2 years***
EPA and/or multistate organizations issue final SIP templates, toolkits, etc. to assist states with development of nonattainment area plans	2 years***
<i>States submit Infrastructure and Transport SIPs</i>	<i>3 years</i>
<i>States submit Attainment plans</i>	<i>3.5 to 5 years</i>

*Includes transition provisions, emissions estimation/source testing provisions, permit modeling, screening tools (SER, SIL, other), increments, and precursor implementation.

**Timing for other guidance/rules depends on the CAA requirements for the NAAQS.

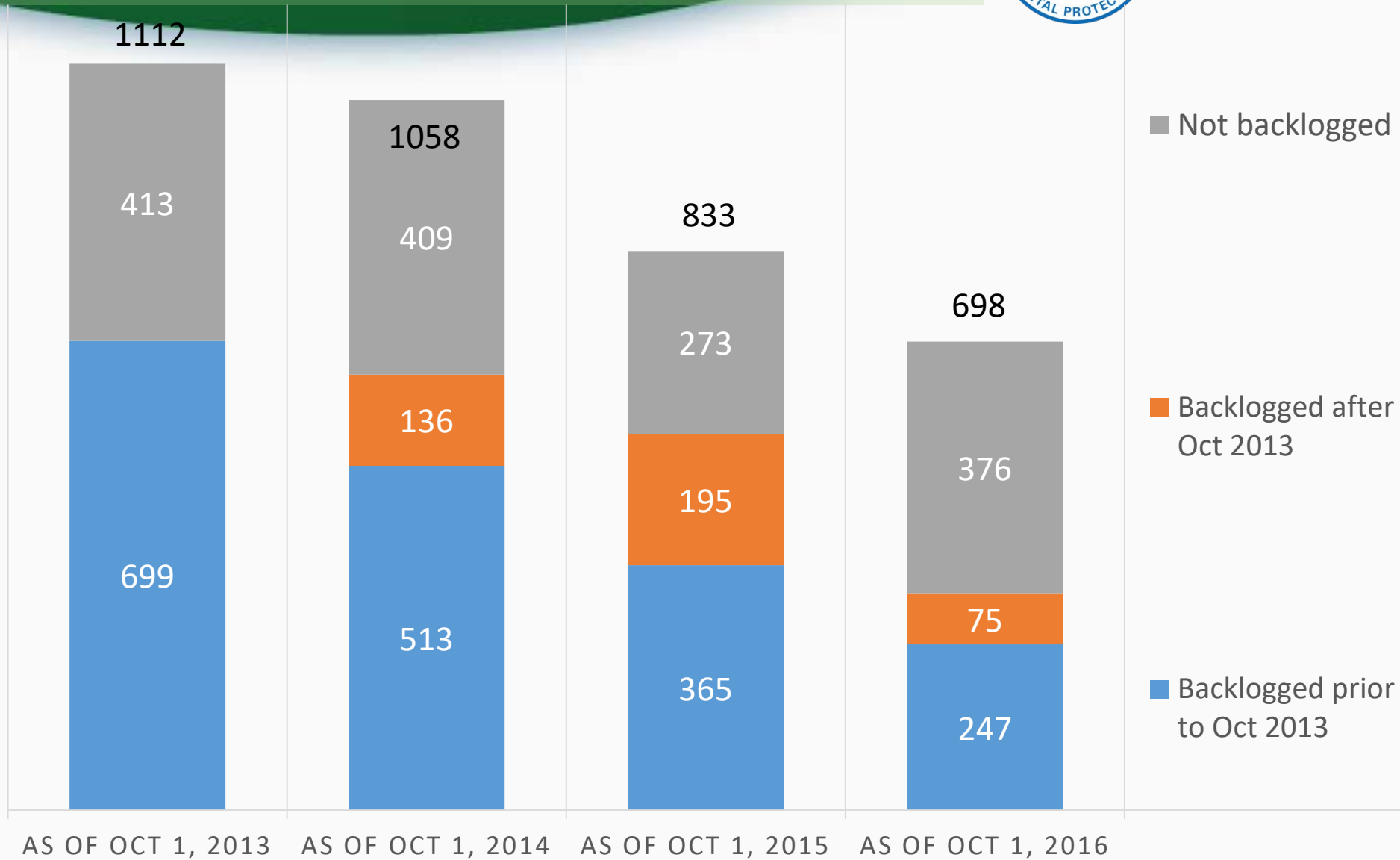
***Designations can be finalized in 3 years under certain circumstances, in which case associated guidance could also be issued at the 3-year point.

What is A Backlog SIP?

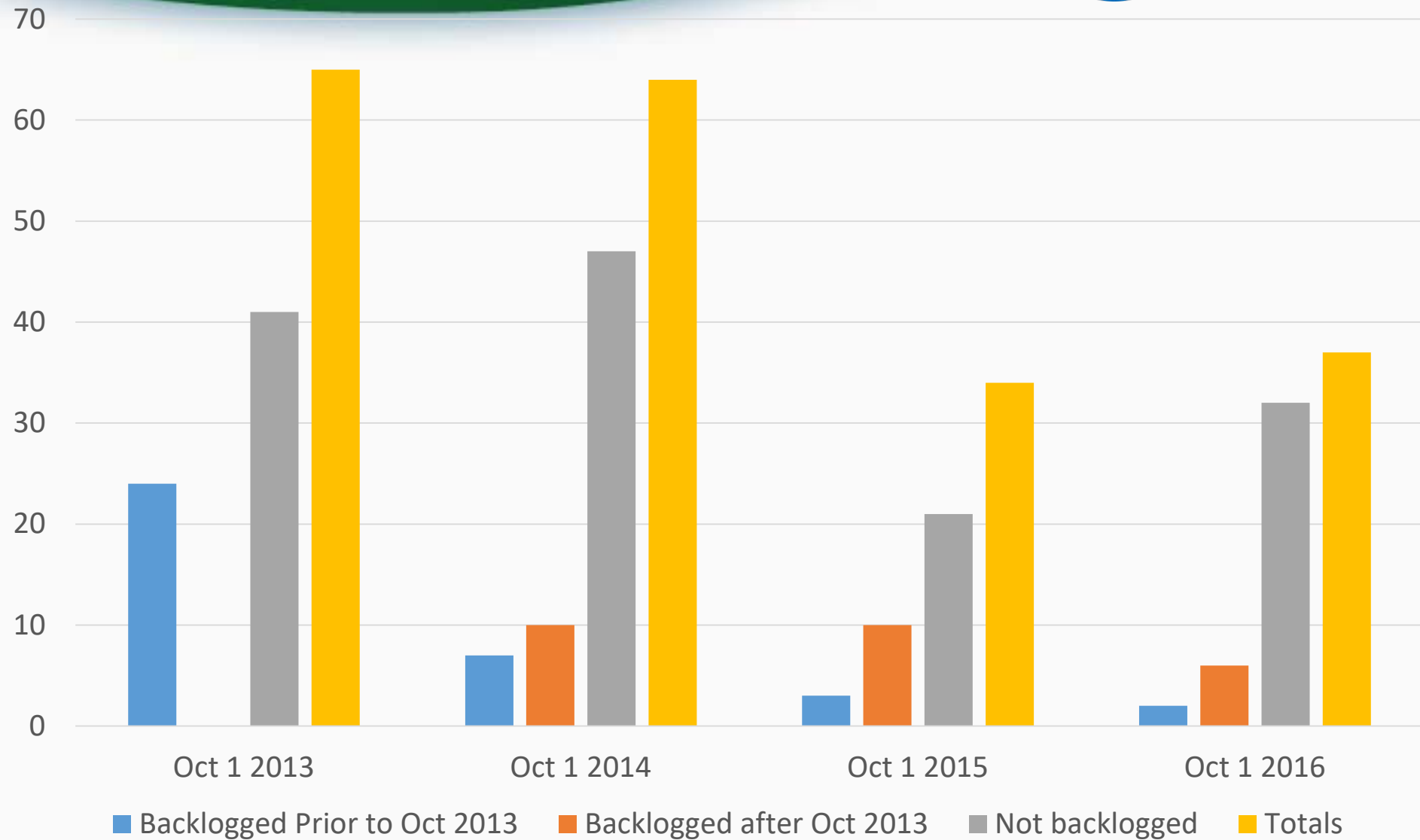


Backlog SIP: Any formally submitted SIP revision that has been pending before EPA (awaiting final rulemaking) for 12 months or more after having been determined to be complete.

National Trends in Active SIPs



Trends in Active SIPs – EPA Region III



SIP Tracking/Transparency



SIP Status Report

- EPA's website has information to track current SIP submittals and EPA's actions.
- Has historical information on SIP submittals for all NAAQS, back to the 1971 SO₂ & 1979 ozone NAAQS
- <https://www.epa.gov/air-quality-implementation-plans/sip-status-reports#designated-areas>

State Plan Electronic Collection System (SPeCS) for SIPs

- EPA is developing an integrated electronic submission system for SIPs and other state plans that enables EPA to:
- Manage state submissions more efficiently and effectively
- Increase transparency through data availability
- **More on this in a presentation tomorrow.**

EPA's Lean (Kaizen) Efforts



SIP Lean Action Board (LAB)

Goal: Build an online resource for recommended best practices, tools and templates for processing SIPs.

Products include:

- Online Toolkit though SharePoint accessible to regions and states/locals
- Recommended best practices, tools and templates for regions and states
- Recommended joint agreement between regions and states for better communication and overall SIP planning

EPA Region III SIP Lean Efforts

- Completed Lean process in 2016 to streamline & modernize our rulemaking approval process (electronic concurrence).
- In 2017, will participate in Lean transference project for the SIP Review Process using tools developed through the SIP LAB.
 - Transference is the process of applying changes, practices, and tools developed from previous Lean projects.



Questions / Comments / Discussion