NAAQS AND OTHER IMPLEMENTATION UPDATES

Anna Marie Wood, Director
Air Quality Policy Division
OAQPS, U.S. EPA
NACAA Fall Meeting
September 2017
OVERVIEW

- NAAQS Implementation Updates
  - Ozone
  - SO₂
  - Fine Particulate Matter (PM$_{2.5}$)
- Exceptional Events
- Transport
- Regional Haze
- Startup, Shutdown, and Malfunction (SSM) Policy for SIPs and SIP Call
- NSR and Title V Permitting Updates
- Reducing the SIP Backlog
- State Plan Electronic Collections System for SIPs
## NAAQS Reviews: Status Update
(September 2017)

<table>
<thead>
<tr>
<th>Last Review Completed (final rule signed)</th>
<th>Ozone</th>
<th>Lead</th>
<th>Primary NO₂</th>
<th>Primary SO₂</th>
<th>Secondary (Ecological) NO₂, SO₂, PM¹</th>
<th>PM²</th>
<th>CO</th>
</tr>
</thead>
</table>

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<thead>
<tr>
<th>Recent or Upcoming Major Milestone(s)</th>
<th>TBD⁴</th>
<th>TBD⁴</th>
<th>July 14, 2017 Proposal</th>
<th>Summer 2017 Draft PA and REA</th>
<th>May 24-25, 2017 CASAC review of 1st Draft ISA</th>
<th>May 25, 2018 Proposal</th>
<th>Dec 2016 Final IRP</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>April 6, 2018 Final</td>
<td></td>
<td></td>
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<td>TBD⁴</td>
</tr>
</tbody>
</table>

### Additional information regarding current and previous NAAQS reviews is available at: [http://www.epa.gov/ttn/naaqs/](http://www.epa.gov/ttn/naaqs/)

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¹ Combined secondary (ecological effects only) review of NO₂, SO₂, and PM
² Combined primary and secondary (non-ecological effects) review of PM
³ IRP – Integrated Review Plan; ISA – Integrated Science Assessment; REA – Risk and Exposure Assessment; PA – Policy Assessment
⁴ TBD = to be determined
<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Final NAAQS Date</th>
<th>Designations Effective</th>
<th>Infrastructure SIP Due</th>
<th>Attainment Plans Due</th>
<th>Attainment Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO$_2$ (2010) (primary)</td>
<td>Jan 2010</td>
<td>Feb 2012</td>
<td>Jan 2013</td>
<td>N/A</td>
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</tbody>
</table>
2008 Ozone NAAQS Implementation

- **Final Implementation of the 2008 NAAQS for Ozone: State Implementation Plan Requirements Rule** published March 6, 2015 (80 FR 12264)
  - Provides interpretive rules and guidance on nearly all aspects of the attainment planning requirements for designated nonattainment areas
  - Revoked the 1997 NAAQS (effective April 6, 2015) and established anti-backsliding requirements
  - Litigation underway; oral arguments took place on September 14, 2017

- **Key implementation dates for nonattainment areas:**
  - Emissions inventories, emissions statement rules and RACT SIPs due July 2014
  - Attainment plans and demonstrations due July 2015 (Moderate) or July 2016 (Serious and above)
  - Marginal area attainment date July 20, 2015 (attainment determined by 2012-2014 air quality data)
  - Moderate area attainment date July 20, 2018 (2015-2017 air quality data)

- EPA continues to take action, as necessary, to review required SIPs submitted by states and to determine whether nonattainment areas are attaining the 2008 standard by their respective attainment dates
South Coast Air Quality Management District and environmental petitioners (Sierra Club et al.) challenged various aspects of the 2008 Ozone NAAQS SIP Requirements Rule, including creditability of reasonable further progress (RFP) control measures, revocation of 1997 NAAQS and application of regulatory anti-backsliding requirement. (Oral arguments held September 14, 2017.)

On January 13, 2017, in response to a complaint filed by environmental petitioners, the EPA found that 15 states and the District of Columbia failed to submit certain SIP revisions required under the 2008 ozone NAAQS (82 FR 9158; February 3, 2017; effective March 6, 2017).
- The finding of failure to submit action gives formal notice to affected parties, and establishes deadlines by which they either must submit complete SIP revisions or become subject to mandatory sanctions.
- EPA also entered into a Consent Decree with the petitioners on January 19, 2017, which sets deadlines for EPA to complete final actions on SIP submittals by various dates ranging from June 2017 to July 2018.

On July 27, 2017, the Center for Biological Diversity and the Center for Environmental Health filed a Notice of Intent to sue for EPA’s alleged failure to make a failure of finding to submit for various SIP submittals required for 2008 ozone NAAQS nonattainment areas reclassified to Moderate in 2016.
Progress on Ozone NAAQS Attainment  
(as of August 2017)

<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>Initial Nonattainment Areas</td>
<td>115</td>
<td>46</td>
</tr>
<tr>
<td>Areas Redesignated to Attainment</td>
<td>80 (prior to revocation)</td>
<td>8</td>
</tr>
<tr>
<td>Current Nonattainment Areas</td>
<td>35</td>
<td>38</td>
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<tr>
<td>Clean Data Determinations</td>
<td>26</td>
<td>18*</td>
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<tr>
<td>Redesignation Substitutes</td>
<td>2</td>
<td>n/a</td>
</tr>
<tr>
<td>Reclassifications to Higher Classification</td>
<td>n/a after revocation</td>
<td>13</td>
</tr>
</tbody>
</table>

*Includes 15 Marginal area determinations of attainment by the attainment date and 3 Moderate area clean data determinations.
Final National Ambient Air Quality Standards for Ozone Rule signed October 1, 2015 (80 FR 65292), revising the primary and secondary 8-hour ozone standards to 0.070 ppm
- Litigation on the level of the standard is being held in abeyance while EPA reviews the 2015 rule to determine whether the standards should be maintained, modified, or otherwise reconsidered

- Proposed rule comment period closed February 13, 2017; timing of final rule TBD

The statutory deadline for designations is October 1, 2017
- The EPA Administrator may determine that an extension of time to complete designations, as permitted by the CAA, is necessary

2015 Ozone NAAQS: Implementation-Related Rules/Guidance/Activities
2010 SO₂ NAAQS Designations: Round 1

- EPA revised **Primary NAAQS for Sulfur Dioxide (SO₂) standard** on June 3, 2010 to 75 ppb/1-hour (75 FR 35520)

- EPA designated 29 areas as nonattainment on July 25, 2013 (Round 1)
  - **Guidance for 1-hr SO₂ NAAQS NAA SIP Submissions** was issued on April 23, 2014
  - Attainment plans for the 29 areas were due April 4, 2015
  - EPA issued findings of failure to submit (FFS) attainment plans for 16 areas in 11 states, effective April 18, 2016 (81 FR 14736; published March 18, 2016)

- EPA is working with affected states to develop SIPs and to take action on submitted SIPs
2010 SO₂ NAAQS Designations

• Consent decree entered on March 2, 2015, by U.S. District Court for Northern California in *SIERRA CLUB and NATURAL RESOURCES DEFENSE COUNCIL v. EPA* “triggered” the following deadlines:
  - **July 2, 2016** - The EPA must complete a round of designations for 61 areas associated with approximately 64 EGUs in 24 states and any undesignated areas with violating monitors (“Round 2” designations)
  - **December 31, 2017** - The EPA must complete an additional round of designations for any area a state has not established a new monitoring network by January 1, 2017 per the provisions of the SO₂ Data Requirements Rule (“Round 3” designations)
  - **December 31, 2020** - The EPA must complete designations of all remaining, undesignated areas (expected to be areas where states elected to monitor per the provisions of the DRR) (“Round 4” designations)

• **Final Data Requirements Rule for 1-hr Sulfur Dioxide (SO2) Primary National Ambient Air Quality Standard** issued August 2015 (80 FR 50152), established requirements for air agencies to monitor or model ambient SO₂ levels in areas with largest sources of SO₂ emissions to help implement the 1-hour SO₂ NAAQS. Data gathered under this rulemaking is assisting EPA and states to conduct Rounds 3 and 4 of designations.
2010 SO$_2$ Designations: Rounds 2 and 3

• Round 2: In 2016, EPA finalized designations for 65 areas: 7 nonattainment areas, 41 unclassifiable/attainment areas, and 17 unclassifiable areas
  - For 61 areas, effective date of designations was Sept. 12, 2016, and for the 4 nonattainment areas in this group the state attainment SIP is due March 12, 2018
  - For 4 areas in Texas, the effective date of designations was Jan. 12, 2017, and for the 3 nonattainment areas in this group the state attainment SIP is due July 12, 2018

• Round 3: On August 22, 2017, EPA notified states and tribes concerning any intended modifications to their designation recommendations ("120-day letters")
  - These responses included identification of 107 unclassifiable/attainment areas, 36 unclassifiable areas, and 11 potential nonattainment areas.
  - The notification of availability and public comment period was published on September 5, 2017 (82 FR 41903)
  - Comment period ends on Oct. 5, 2017
  - States requested to provide final input by October 23, 2017
  - EPA signs notice promulgating final SO2 area designations for Round 3 by no later than December 31, 2017
2010 SO$_2$ Designations: Round 4

- Round 3 SO$_2$ designations will designate all areas of the country, except those where states timely sited monitors consistent with the SO$_2$ Data Requirements Rule.

- EPA will designate all remaining areas (approximately 50 areas) by the December 2020 consent decree deadline.
On May 10, 2017 (82 FR 21711), EPA finalized Notice of Determinations of Attainment/Findings of Failure:
- Determinations of attainment for 7 areas
- Findings of failure to attain by the December 31, 2015 attainment date, and reclassification to Serious for 3 areas

Serious area attainment date is December 31, 2019:
- Extension up to December 31, 2024 is possible if cannot demonstrate attainment by 2019. Requires Most Stringent Measures in any state

EPA finalized two 1-year attainment date extensions for the Logan, UT-ID nonattainment area to December 31, 2017 (final actions signed in August 2017)

EPA is working to take final action this year on a number of submitted Moderate area plans and will continue to work with states developing Serious area plans to address air quality challenges
PM$_{2.5}$ NAAQS Implementation: SIP Requirements Rule

- **PM$_{2.5}$ NAAQS SIP Requirements Rule finalized on August 24, 2016 (81 FR 58010)**
  - Provided framework for planning requirements for 2012 and future PM$_{2.5}$ NAAQS and informs implementation for areas still violating 1997 and/or 2006 PM$_{2.5}$ NAAQS

- **November 2016 EPA issued draft PM$_{2.5}$ Precursor Demonstration Guidance**
  - Recommends technical approaches for precursor demonstrations to assess whether air quality impact from a particular precursor can be considered to be insignificant in a given area
  - Comment period was extended to March 31, 2017; EPA is considering comments; revised guidance timing is TBD

- **South Coast Air Quality Management District filed suit challenging whether EPA erred by requiring in the PM$_{2.5}$ NAAQS SIP Requirements Rule that emissions reductions for RFP come from sources within the nonattainment area (consistent with past court decision)**
  - Litigation is held in abeyance until a decision is made on a similar challenge on the 2008 Ozone Implementation Rule, for which oral arguments took place on September 14, 2017
2012 PM$_{2.5}$ NAAQS Implementation

• EPA revised the PM$_{2.5}$ NAAQS primary annual PM$_{2.5}$ standard to 12µg/m$^3$ on December 14, 2012 (78 FR 3086)
  
  ▪ Nine Moderate nonattainment areas were designated in 2015
  
  ▪ Moderate area attainment plan due date - October 2016
  
  ▪ Moderate area attainment date - December 31, 2021
  
  ▪ Serious area attainment date - December 31, 2025

• On August 3, 2017, the Center for Biological Diversity, Center for Environmental Health and the Clean Air Council informed the EPA of their intent to sue for the alleged failure to make a finding of failure to submit for certain nonattainment areas for the 2012 PM$_{2.5}$ NAAQS
## Progress on PM$_{2.5}$ NAAQS Attainment

(as of August 2017)

<table>
<thead>
<tr>
<th></th>
<th>1997 PM$_{2.5}$ (2005 Designations)</th>
<th>2006 PM$_{2.5}$ (2009 Designations)</th>
<th>2012 PM$_{2.5}$ (2015 Designations)</th>
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<tr>
<td>Initial Nonattainment Areas</td>
<td>39</td>
<td>32</td>
<td>9</td>
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<td>Areas Redesignated to Attainment</td>
<td>32</td>
<td>16</td>
<td>0</td>
</tr>
<tr>
<td>Current Nonattainment Areas</td>
<td>7</td>
<td>16</td>
<td>9</td>
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<tr>
<td>Clean Data Determinations</td>
<td>5</td>
<td>9</td>
<td>1</td>
</tr>
<tr>
<td>Proposed Redesignations</td>
<td>0</td>
<td>0</td>
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</table>
Exceptional Events

• On September 16, 2016, the EPA finalized the 2016 Revisions to the Exceptional Events Rule, which addresses issues raised by stakeholders, increases the administrative efficiency, and reduces the burden of the Exceptional Event demonstrations process
  - [https://www.epa.gov/air-quality-analysis/treatment-data-influenced-exceptional-events](https://www.epa.gov/air-quality-analysis/treatment-data-influenced-exceptional-events)
  - Rule effective date was September 30, 2016; published in Federal Register on October 3, 2016 (81 FR 68216)
  - NRDC/Sierra Club has challenged the rule’s natural event definition, which can include reasonably controlled anthropogenic sources – currently being briefed before D.C. Circuit Court

• So far in 2017, EPA has concurred on three demonstrations on ozone (CT, Ute Tribe, Washoe County)

• EPA continues to be engaged with stakeholders to seek feedback and identify opportunities to improve process and efficiency – our goal is continuous improvement

• We are interested in feedback regarding tools/resources to facilitate implementation of the rule revisions and realize all potential burden reductions
Coordination, Collaboration, and Communication—ALL CRITICAL!!

- The Initial Notification Process should enable early engagement to establish mutual expectations to “right size” effort and assess the purpose for the data exclusion and what is needed for approvable demonstration based on the rule.

- EPA intends to conduct initial review of demonstrations within 120 days of submission, complete review within 12 months, and defer demonstrations that do not have regulatory significance within 60 days.

- Mitigation plan elements are intended to balance public notification of air quality and resources. Plans have minimum elements and must undergo public notice/comment; however, areas can leverage other plans/resources for mitigation plan elements.
Exceptional Events Implementation: Next Steps

• The 2016 rule revisions and final wildfire/ozone guidance were needed first steps, efficient and coordinated implementation is also critical. What is next?

• Continued development of exceptional events tools
  ▪ Templates
  ▪ Website updates
  ▪ AQS modifications to reflect rule revisions guided by feedback from newly created AQS workgroup
  ▪ Standardized metrics and tracking
  ▪ Targeted efforts with FLMs – communications and tools
  ▪ Best practices for multi-state exceptional events demonstrations

• Possible Additional Implementation Materials
  ▪ Revisions to 2013 Interim Exceptional Events Guidance Documents
  ▪ Stratospheric Ozone Intrusion Document
  ▪ Alternate Paths for Data Exclusion Document
  ▪ Prescribed Fire/Ozone Document

• EPA plans to transition to national electronic tracking system for exceptional events (similar to SPECs for SIPs) in 2018
Exceptional Events Implementation: Available Resources

- Exceptional Events Website at [http://www2.epa.gov/air-quality-analysis/treatment-data-influenced-exceptional-events](http://www2.epa.gov/air-quality-analysis/treatment-data-influenced-exceptional-events)
- Quick reference guide for exceptional events demonstrations
- Examples of reviewed exceptional event submissions
- Best practices documents
- Links to publicly available support information and tools
- Links to rule and guidance resources
  - Final rule
  - Final wildfire/ozone guidance
  - Fact sheets
  - 2013 interim guidance documents
Ozone Transport

• Congress established multiple CAA provisions that can be used to address interstate transport of air pollutants that are contributing to nonattainment or interfering with maintenance of NAAQS: section 110(a)(2)(D)(i)(I) (also known as the “good neighbor” provision), section 126 and section 176A

• The CAA envisions a SIP-led process; EPA is focused on a SIP first approach wherever possible

• States have asked EPA for information and guidance to enable states to develop approvable and timely transport SIPS to address regional (multi-state) air quality problems
Good Neighbor Transport SIPs for Ozone NAAQS

• **Section 110(a)(2)(D)(i)(I)** – (the “good neighbor” provision) requires upwind states to implement a share of the emission reductions needed for downwind areas to attain and maintain the NAAQS

• **Outstanding good neighbor obligations for the 2008 ozone NAAQS**
  - CSAPR Update was a partial remedy for 21 eastern states (full remedy for TN).
    - AL, AR, IL, IN, IA, KS, KY, LA, MD, MI, MS, MO, NJ, NY, OH, OK, PA, TX, VA, WV, and WI
  - CSAPR Update Rule did not address 2008 transport obligations for western states
  - There are 24 states for which EPA does not have a pending SIP and continues to have a FIP obligation.
    - Kentucky – EPA is under a court-ordered deadline of June 30, 2018 for a full FIP; however, EPA can moot the FIP obligation if it fully approves a SIP from KY
    - For other states, EPA has statutory FIP deadlines ranging from August 2017 to March 2019.
  - EPA is currently developing updated interstate ozone transport modeling using an analytic year of 2023 and hosted conference calls with MJOs and states in August to discuss plans for this modeling.
176A Petition and CSAPR Update States

- Petitioning State
- Named Upwind State
- CSAPR Update State
- Both Named State and CSAPR Update State
- Both Petitioning State and CSAPR Update State
## Clean Air Act Section 126

<table>
<thead>
<tr>
<th>Petitioning State</th>
<th>Response Deadlines</th>
<th>Named EGU Sources</th>
<th>Ozone NAAQS Cited</th>
</tr>
</thead>
<tbody>
<tr>
<td>CT(^1)</td>
<td>1/25/17</td>
<td>Brunner Island, PA</td>
<td>2008</td>
</tr>
<tr>
<td>MD(^2)</td>
<td>7/15/17</td>
<td>36 EGUs at 19 facilities in IN, KY, OH, PA and WV</td>
<td>Emphasized 2008</td>
</tr>
</tbody>
</table>

\(^1\) On May 16, 2017, CT filed a mandatory duty suit in the U.S. District Court in Connecticut for EPA's failure to respond to its 126 petition by the January 2017 deadline. Sierra Club and the Connecticut Fund for the Environment have intervened as plaintiffs.

\(^2\) On July 20, 2017, MD provided its notice of intent to sue for EPA's failure to respond to its 126 petition. Several environmental groups have also provided notice of their intent to sue on the same petition.
Cross-State Air Pollution Rule

• CSAPR (finalized July 2011) addresses interstate transport obligations for the 1997 ozone NAAQS (and the 1997 and 2006 PM$_{2.5}$ NAAQS)

• CSAPR Update (finalized September 7, 2016) updates CSAPR ozone season program by addressing summertime transport of ozone for the 2008 ozone NAAQS in the eastern US
  ▪ Covers 22 eastern states and sets power sector ozone season NO$_X$ emission budgets for each covered state starting with the 2017 ozone season (May 1, 2017)
  ▪ Establishes a new ozone season NO$_X$ allowance trading program for CSAPR Update states
  ▪ Facilitates a smooth transition by creating a starting bank of allowances, converted from 2015-2016 allowances banked under the original CSAPR ozone season NO$_X$ trading program
  ▪ Responds to the July 2015 D.C. Circuit remand of CSAPR Phase 2 ozone season emission budgets for 11 states. EPA is also working to respond to the remand of the Phase 2 SO$_2$ emissions budgets. In November 2016, EPA proposed action and we expect to finalize action very soon.
  ▪ Additional information at http://www.epa.gov/airmarkets/final-cross-state-air-pollution-rule-update
  ▪ Legal challenges to the CSAPR Update are currently pending in the United States Court of Appeals for the D.C. Circuit. Petitioners’ briefs were filed on September 18, 2017 (EPA’s brief is due December 18, 2017).
Regional Haze: Status of Actions from First Implementation Period

Plans with ongoing litigation
Regional Haze Looking Forward: Planning for the Next Cycle of SIPs

• Rule revisions were finalized on January 10, 2017 (82 FR 3078):
  ▪ Petitions for review were filed in the D.C. Circuit as well as petitions for reconsideration

• On July 8, 2016 (81 FR 44608), EPA released draft guidance for two key aspects of the program:
  ▪ 1) Visibility Tracking – Tracking visibility progress based on impacts from controllable, anthropogenic emissions instead of all sources
  ▪ 2) Reasonable Progress (RP) Guidelines – Guidance for evaluating the statutory factors and making decisions on RP controls

• EPA is currently considering public comments as we work to finalize the guidance document

• Timing for final guidance document: TBD
SSM SIP Call under Policy Review

- Final SSM SIP Action of 2015 concerned SIP provisions for treatment of excess emissions occurring during periods of startup, shutdown and malfunction (SSM)
  - Restated EPA’s SSM Policy as it applied to SIPs with one change regarding affirmative defense (AD) provisions
  - Included SSM SIP Call that applied to 36 states (45 jurisdictions)

- Judicial review of the SSM Action is pending before the D.C. Circuit, but case is currently being held in abeyance to allow for review by the new administration
Permit Streamlining Executive Actions

- Several executive actions related to permit streamlining:
  - E.O. 13777 “Enforcing the Regulatory Reform Agenda”
  - E.O. 13783 “Promoting Energy Independence and Economic Growth”
  - E.O. 13766 “Expediting Environmental Reviews and Approvals for High Priority Infrastructure Projects”
  - July 19, 2017 Order “Establishing a Presidential Advisory Council on Infrastructure”
- Many comments on Clean Air Act permitting from a variety of stakeholders were received through the public outreach regarding the first two executive actions listed here
- EPA is reviewing the feedback and considering the best approaches for moving forward with permit streamlining in light of the various executive orders and corresponding priorities
Title V Permitting

- On August 24, 2016, proposed the Revisions to the Petition Provisions of the Title V Permitting Program to increase transparency and stakeholder understanding of the petition process, as well as ensure that the Agency is able to efficiently address related programmatic and air quality issues (81 FR 57822)
  - The comment period closed on October 24, 2016 and EPA is in the process of reviewing the comments received. Timing: TBD

- On August 26, 2016, EPA proposed the Revisions to the Prevention of Significant Deterioration (PSD) and Title V Greenhouse Gas (GHG) Permitting Regulations and Establishment of a Significant Emissions Rate (SER) for GHG Emissions Under the PSD Program (81 FR 68110)
  - The public comment period closed on December 16, 2016 and EPA is currently reviewing comments. Timing: TBD
Title V Permitting

• **Title V Program and Fee Evaluation Guidance**
  - Satisfies EPA commitments to 2014 Office of Inspector General (OIG) report recommending enhanced oversight of state and local title V program fee practices
    - Guidance for EPA regions on conducting state and local title V program and fee evaluations
  - Discretionary for EPA regions and no specific requirements for state programs
  - Consistent with the principles and best practices for oversight of state permitting programs contained in the August 30, 2016 document “Principles and Best Practices for Oversight of State Permitting Programs”, developed by EPA’s Cross-Media State Programs Health and Integrity Workgroup

• **Timing:** anticipate issuing final guidance in late 2017
Guidance on Significant Impact Levels (SILs) for Ozone and PM\(_{2.5}\) in the Prevention of Significant Deterioration Permitting Program

• Draft guidance recommends SILs for Ozone and PM\(_{2.5}\)
  ▪ A SIL is a compliance demonstration tool to help determine whether a proposed PSD source causes or contributes to a violation of the NAAQS or PSD increment
  ▪ If a PSD applicant can show through air quality modeling that the projected impact from a proposed source is less than a SIL value for a particular pollutant, the permitting authority can conclude that the proposed source will not cause or contribute to a violation of a NAAQS or a PSD increment for that pollutant

• Draft guidance comment period from August 1, 2016 through September 30, 2016; comments under consideration

• Timing for final guidance issuance – TBD
SIP Processing Improvements: State Plan Electronic Collection System (SPeCS)

- SPeCS will provide an efficient electronic system for:
  - State submission and tracking of multiple types of plans
  - EPA review process and requirements tracking
  - Public dashboard with SIP Status reports and info on state submissions and EPA actions

- Benefits: reduce paper/mailing costs/storage, save staff time and resources, integrate multiple legacy tracking systems, increase transparency, lead to more efficient process

- EPA greatly appreciates input from state/local officials through Integrated Project Team, webinars and Regional Hub calls, and recent beta-testing

- System launch and training for State and EPA users: December 2017/January 2018
SPeCS for SIPS: Major Components

**Plan Collection Interface**
- *For use by air agency staff*
- Electronic file upload capability; builds upon May 2017 eSIP enhancement
- Enables air agency to identify specific requirements included in plan
- State landing page provides info/links for all past and pending submissions

**EPA Plan Review Clearinghouse**
- *For use by EPA*
- Facilitates concurrent review by multiple EPA offices
- Tracks compliance with SIP requirements
- Electronic storage and online searching of documents

**Public Dashboard**
- *For use by the public and states*
- National and state SIP status information
- Links to submitted plans, FR notices, and related information
SIP Processing Improvements

• EPA remains committed to reducing the SIP backlog and improving SIP processing times

• Trends in SIP processing:
  ▪ Total pending SIPS reduced by 38% (between October 2013 and August 2017)
  ▪ Historic backlogged SIPS reduced by 78% (between October 2013 and August 2017)

• SIP management improvement efforts ongoing
  ▪ SIP management plans continue to provide opportunities for EPA regional offices and states to engage on setting SIP action priorities
  ▪ EPA emphasizing early engagement with air agencies
  ▪ EPA maintaining emphasis on internal SIP processing improvements
    • Identification and implementation of best practices in SIP processing and collaboration between states and EPA will help ensure continuous improvement
    • Significant investment in IT improvements will also contribute in this area
The Lean Action Board (LAB)

- EPA-State initiative
- Chartered to pursue opportunities to transfer learning and successful results from Lean projects
- Identified SIP as a priority out of 100+ projects
SIP LAB Transference Goals

- Educate EPA and air agencies on tools and resources available to improve SIP processing through the use of the ‘toolkit’
- Institute use of efficiency tools particularly in EPA regions and air agencies
STATE IMPLEMENTATION PLAN (SIP)
PROCESS IMPROVEMENT TOOLKIT

ABOUT THE TOOLKIT

• An online library to share tools, templates, and examples from the NACAA-ECOS-EPA SIP reform workgroup and successful state and EPA process improvement projects

• One-stop-shop for best practice information

• Applicable to EPA, state, tribal, and local air agency staff

https://goo.gl/muv7na

BENEFITS

- Improve efficiency and clear backlogs to allow focus on state and EPA priority actions

- Provide more certainty to industry by ensuring timely action on SIPS

- Enhance state-EPA partnerships

- Spend less time on process and more time helping areas achieve air quality goals
Questions/Comments on SIP Management

• How are things going from your perspective?

• Any specific challenges that you would like us to be aware of as we continue to move forward with improving our SIP management processes?

• What has been working particularly well for you and any areas for improvement?
Questions and Comments