

SIP Reform – Regional Perspective

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Similarities btwn R4 & R7

- Both Regions face similar challenges & opportunities with regard to SIP reform.
 - Impact of litigation on:
 - Ability to take favorable actions on submission;
 - Regional prioritization.
 - Multiple competing priorities to SIP Processing.

SIP Sublead Activities

- Looking for increased ways to leverage internal EPA resources for SIP processing.
 - Utilizing workgroups to develop templates.
 - More investigation on all tools available to EPA.
- Enhancing internal process for elevation & resolution of emerging issues

McCabe SIP Consistency Memorandum

- Released April 6, 2011.
- Addresses...
 - Number of copies & types of SIP submissions;
 - Public noticing/hearings required;
 - Differences for determination of attainment, clean data determinations & redesignations; &
 - Use of letter notices.
- States/EPA taking advantage of these flexibilities where appropriate.

R4 Protocol on SIP

Comments

- Addresses desire by states for EPA to distinguish comments which must be addressed for full approval versus comments that are suggestions for improvement, clarity.
- Documents best practices in Region 4.
- Highlights opportunities for EPA/State to work through issues at the predraft level to:
 - Limit EPA comments during prehearing stages; &
 - allow for more efficient processing of final submissions.
- Protocol being seen as a model for other

Other Resources on the Way...

- Supplements to the McCabe Memo
 - Example transmittal letters
 - SIP Efficiency Tools & Resources Document – product of the SIP Kaizen.
- Ozone attainment demonstration crosswalk & example language
- Control Options Database

Southeast SIP Reform Efforts

- SC, NC & Region 4 following up on recommendations made by SE states.
- Several recommendations addressed to date by:
 - McCabe SIP Consistency Memorandum
 - Region 4 Protocol on SIP Comments
- Next steps on remainder of comments to be discussed later.