State Implementation Plans 101

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LOUISIANA DEPARTMENT OF **ENVIRONMENTAL QUALITY**

: A CLEAN STATE OF MIND FOR ALL YOUR ENVIRONMENTS

Introduction

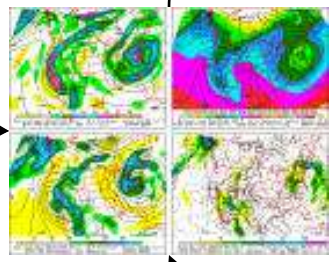
- Defining the State Implementation Plan (SIP) process
- What dictates this process?
- What goes into a SIP?
  - Enforceable Measures
  - Voluntary Measures
  - Modeling
  - Projections

Air Quality Management Process

Air Monitoring

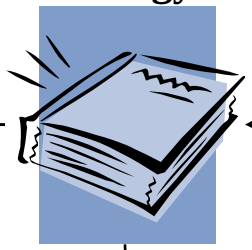
Planning

Modeling



Rulemaking

Control Strategy



Emissions Inventory

Industry

Permit

What is a State Implementation Plan (SIP)?

It's a plan for "clean air!"

- **Clean Air Act requires a general plan to achieve the NAAQS in all areas of the country and a specific plan for each nonattainment area.**

- **Each state is responsible for developing plans to demonstrate how standards will be achieved, maintained, and enforced.**

- **These SIPs are developed by States, and in some cases, by locals.**

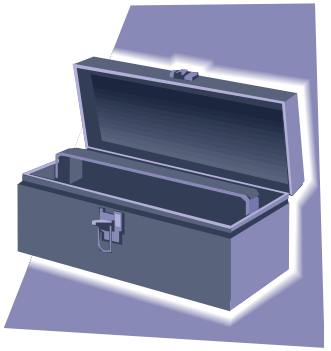
What is a SIP cont…

- SIPs and associated control measures are enforceable at both the state and national levels.
- Plans are the framework or the state's recipe for success, to ensure that the air is clean and healthy for the citizens of the area.
- SIPs are living documents and must be updated, or revised, regularly to reflect changes in NAAQS or air quality monitoring data.

What are the Steps Followed to Prepare a SIP?

- Determine emissions
- Develop strategy
- Determine emission changes
- Model to determine air quality changes
- Compare to NAAQS
- Adjust strategy as necessary and reanalyze
- Draft rules to implement strategy
- Adopt rules using state process and minimum federal public participation requirements (40 CFR Part 51)
- Submit to EPA
- EPA rulemaking

What tools do we use?

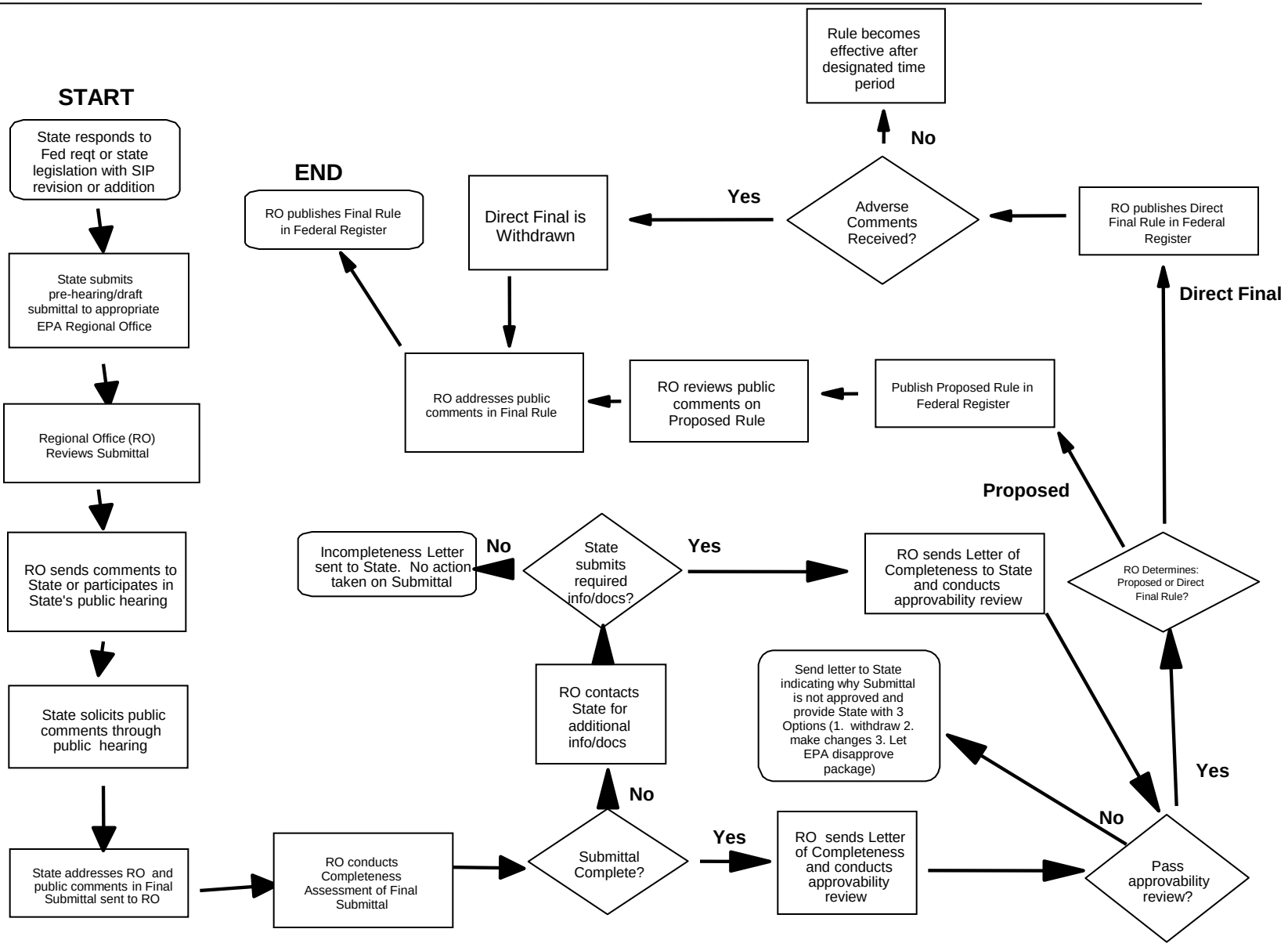


- **Emission inventories, monitoring and air quality models are central to air quality management, they are tools that help to:**
  - understand cause of an air quality standard violation
  - develop control strategies to reach attainment
  - demonstrate that selected strategies will lead to attainment
  - assess whether progress is made toward reaching standard

What is the State Process?

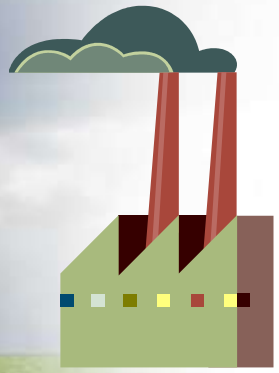
- Although not required, SIP revisions usually go through an environmental board (designated by environmental secretary).
- 30-day Public Notice comment period.
- Public hearing.
- Response to comments.
- Legislative review (State requirement).
- Formal adoption.
- SIP submittal.

Typical SIP Process Flow



Stakeholders

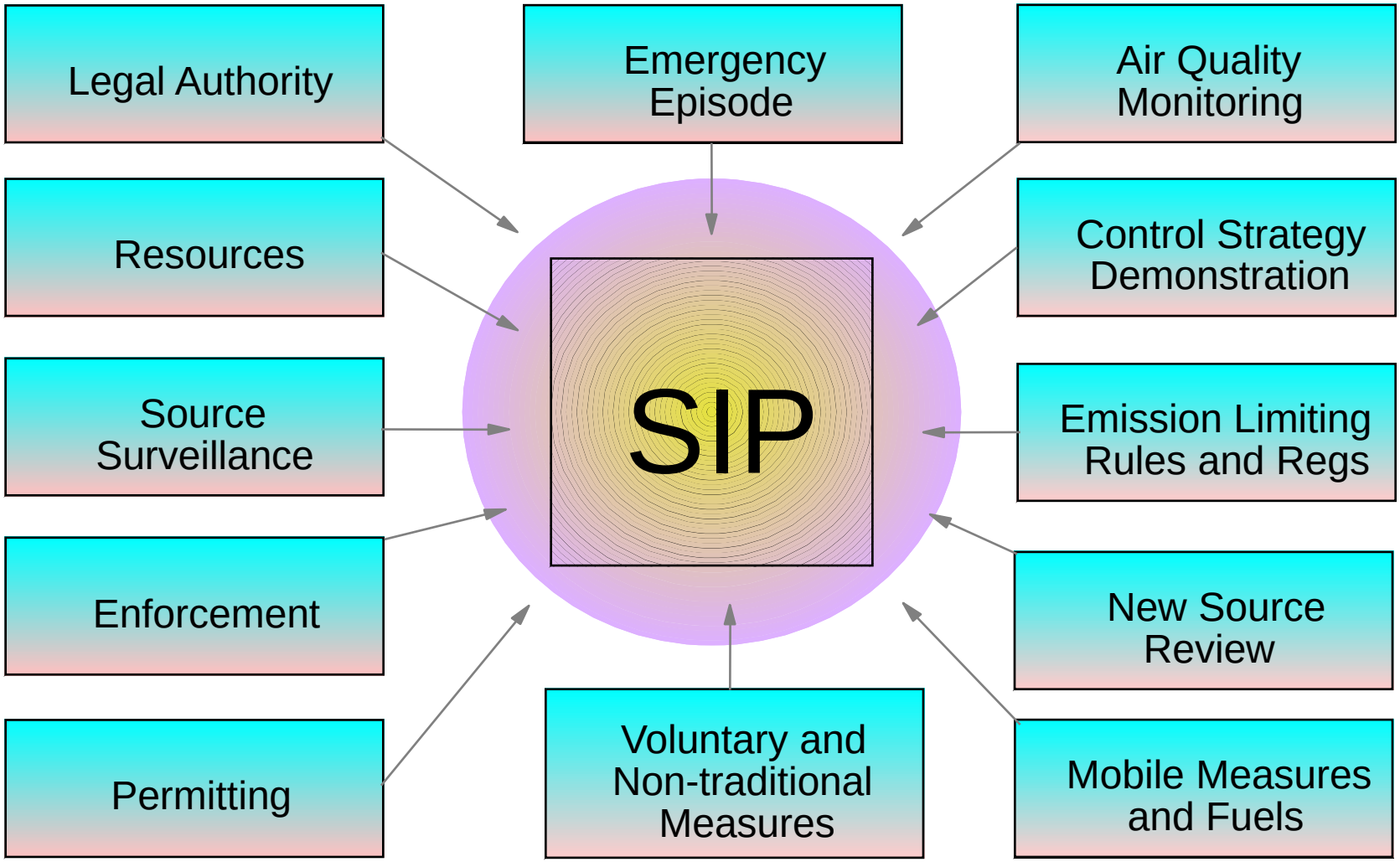
- Federal State and Local Governments
- Regulated Community (Industry)
- Small Business Community
- Environmental groups
- Citizens of the State



The SIP, a Living Document

- Revised by State as necessary
- Addresses unique air pollution problems in State
- Keeping SIP updated is a continuous process
- Number of submittals vary
- The different terms of SIP

Components of a SIP

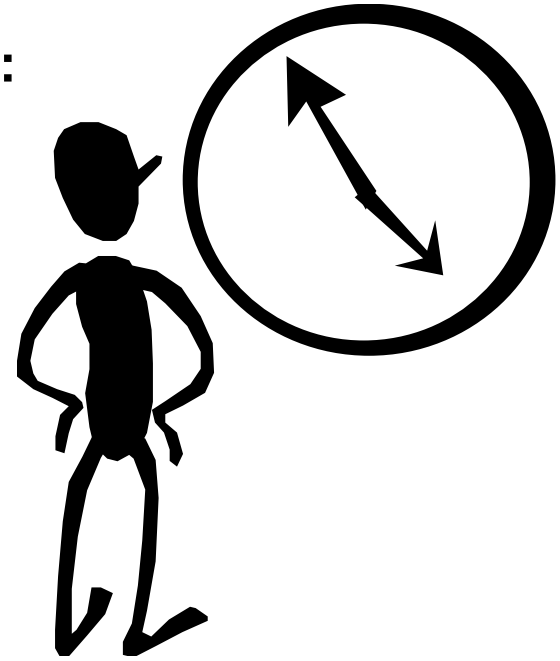


How Long Does A SIP Revision Typically Take?

- **State Evaluation** — **6 months to 1 year**
- **State Rulemaking** — **6 months to 2 years**
- **EPA Approval** — **6 months to 18 months**

What Happens if a SIP Revision is Not Submitted/Disapproval?

- **New Source Review permitting sanctions:**
  - **After 18 months sanctions clock**
  - **2 to 1 offset**
- **Highway funding sanctions:**
  - **After 24 months sanctions clock**
- **Federal Implementation Plan (FIP):**
  - **Within 24 month sanction clock**
  - **Not permanent**



Summary …How the SIP process works

CAA or court case mandates plan submittal , or State/Local decides to revise its own SIP

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State/Local prepares and adopts plan after public hearing

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State submits SIP to EPA Regional office

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EPA reviews SIP for completeness … if complete … propose in FR

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EPA approves/disapproves plan after considering public comments

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After SIP approval, the plan becomes Federally enforceable

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If SIP Federally mandated and disapproved … then FIP promulgated

Questions?

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