

308 SIP Development – A Resource Matrix for SIP Preparers

The WRAP completed a long-term strategic plan in 2003. The Strategic Plan serves as an instrument of coordination and provides the direction and transparency needed to foster stakeholder participation and consensus-based decision making, which are key features of the WRAP process. The strategic plan also provides guidance to the individual plans of WRAP forums and committees which are included in the WRAP 2005 work plan.

The States and Tribes that are currently developing the Regional Haze SIPs will also rely on other resources to complete these plans. A partial list of documents that relate to the completion of an approvable SIP revision are included at the end of this document. One of the major charges to the Implementation Work Group is to develop a SIP framework architecture that the states and Tribes will use to draft SIP documents for public review, approval and submittal to the EPA.

The basic concerns and challenges that states and tribes face in developing and submitting SIPs and TIPs is that they must: meet the requirements of statute; meet state and tribal administrative and legislative requirements and be approvable by EPA. That is the Plan must meet the EPA administrative, technical and legal requirements as posed in the Clean Air Act and EPA Rule. The Regional Haze Rule poses significant challenges in each of these areas. Additionally, there is likely to be a great deal of variability in the SIPs and TIPs that the various states and tribes develop and are used in regional planning and programming. Therefore, an initial first step in planning for such a complex undertaking is that all the SIP and TIP preparers gather and utilize all the resources and materials available to them to formulate an approach. The following matrix attempts to establish the types of documents available to SIP and TIP preparers and the relationship to the SIP/TIP document. Some of these tools in this matrix include templates and other framework documents. There is also a policy component and approvability components. This document assumes that the Regional Haze Rule and related Rules (e.g. Annex and BART) lay out the basic requirements and approach to developing and submitting a Plan. This matrix's purpose is to lay out the general areas the Plan will include and identify what resources might be used to address the requirements.

The major headings in this Table are suggested by Table II-1 (pg. 12) in the *2003 WRAP Strategic Plan*. Then, looking at the table, the first column identifies the SIP/TIP elements. The second column lists any pertinent EPA approvability criteria or reference that applies. The third column identifies whether or not there is suggested language that has been developed to address a particular requirement. The last column shows where a particular element of the WRAP Strategic Plan or a Forum or Work Group product supports that area of the SIP document.

Other documents have also been developed to assist SIP preparers track the development of the RH SIPs. One such document developed along with this Matrix is the SIP Roadmap. This shows the process through which the SIP process is completed. The table below shows a brief crosswalk between the Resource matrix and the Roadmap is shown below.

Matrix Component	Roadmap Component
General Plan Provisions § 308 (1) and (2)(c)	13. Other SIP Requirements
Visibility Goals § 308(d)(1) and (2)	5. Determine Base-line Conditions 6. Determine Natural Conditions 7. Calculate Glide Path for Uniform Improvement
Apportionment § 308d(3)(iii)	1. Identify Anthropogenic Sources 2. Complete Emission Inventories 3. List All BART-eligible Sources 4. Analyze Improvement (from the application of BART) 8. Evaluation of Reasonable Progress Goals
Control Measures § 308d(3)(ii) and (e)	10. Develop Long-term Strategies 11. and 12 LTS/BART or equivalent tie-in to Reasonable Progress Goal 4. Analyze Improvement (from the application of BART)
Consultation and future commitments § 308(f), (g) and (h)	9. Goal Consultation

1.0 General Plan Provisions § 308 (1) and (2)(c)			
Plan Component/reference to Road Map	EPA Policy or Guidance	Template or other language (e.g. 309 SIPs) developed/ available	WRAP Strategic Plan or FY05 Work Plan, designated by project number and descriptor in WRAP work plan
Regulatory Background and History This section will provide a background and overview of the Federal Regional Haze Regulation. Further, these sections will trace the history of the Law and Rule since the Congress set forth the national visibility goal in 1977. Under this overview, states/tribes need to include reference to: Section 110 Par D, Integral vista (51.304), the Long Term Strategy (51.306) and New Source Review requirements (Section 51.307)	Yes	Yes	WRAP Strategic Plan
Regional Haze SIP Development Process This relates to the General Plan Provisions of the rule and pursuant to the requirements of 51.308(a) and (b)(1) to submit the Plan to address the 308 requirements. This Section also will state the commitment to participate in a regional planning process pursuant to 51.308(c). This SIP element addresses the five requirements of 51.308(c).	Yes	Yes	WRAP Strategic Plan

2.0 Visibility Goals § 308(d)(1) and (2)			
Plan Component/reference to Road Map	EPA Policy or Guidance	Template or other language (e.g. 309 SIPs) developed/ available	WRAP Strategic Plan or FY05 Work Plan, designated by project number and descriptor in WRAP work plan
Mandatory Class I Areas of Interest The state will identify the Mandatory Class I areas that the plan will be applicable both in and out of the state. 1	SIP Review Guide (draft)	Not specifically included (included under Reasonable Progress)	AoH 1 – AoH report AoH 2 – WIGIMs AMR 2 – Causes of Haze report
Natural and anthropogenic sources of visibility impairment for each Class I area 1,6	Specific requirement refers to anthropogenic sources that were considered in developing the plan natural sources would also be shown as part of technical analysis	See discussion under Long Term Strategy	“Causes of Haze” web site and others (IMPROVE and VIEWS) AoH 1 – Final AoH report AoH 2 – WIGIMs AMR 2 – Causes of Haze report MF 1, MF 2 Regional modeling FF2 fire categorization – maint/rest. DF1 common definition DF2 – enhanced ambient analysis, DF5 dust handbook
Estimates of baseline visibility conditions, natural conditions and presumptive reasonable progress goals for best and worst 20% average days. 5, 7, 10	SIP Review Guide (draft)	Yes	RMC 2018 Baseline, 309(a), 309(b), AoH 1 – First AoH report AoH 2 – WIGIMs DF1 common definition DF2 – enhanced ambient analysis, DF5 dust handbook DF3 fine fraction DF4 wind blown inventroy DF5 dust handbook FF1 2002 inventory & fire tradeoff FF6 Phase III/IV inventories/apportionment EF1 EDMS EF3,Updates on and non road EI for 02’, 08’, 13’ and 18’

2.0 Visibility Goals § 308(d)(1) and (2)			
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			IN1 – EI for in/near MF 1, MF 2 Regional modeling PP2 – Renewables tracking
Calculation of presumptive Reasonable Progress Goals for each Class I Area in a state or Tribal boundary 7, 8, 10	SIP Review Guide (draft) EPA Guidance documents	Chapter 9 in Mane-VU SIP Template	RMC 2018 Baseline IO1 Reasonable Progress FFB & FFD fire inventory/sensitivity IN2 In/near strategies PP2, PP3, PP5, PP6 Energy issues MS3
Demonstration of reasonableness of RP Goal for each Class I area This part would identify Class I Areas NOT meeting presumptive RP Goals from base case 2018 Long Term Strategy and additional analysis of strategies will be needed. 7, 8, 10	SIP Review Guide	Not specifically described	IO1 – Reasonable Progress Criteria SS5 – Regional Stationary Source Strategy Development Others? 309(b) 309 follow up AoH2 WIGIMs SS4, SS5 Emissions and strategy development EA5, EA6 Economic outreach and support PP2, PP3, PP5, PP6 Energy issues MS3 Mobile source analysis AMC3 Health effects
Identification of Class I Areas showing greater progress than presumptive RP Goals and require no further analysis. Comment: This would be an identification of Class I Areas showing greater progress than presumptive RP Goals and require no further analysis. 5	Not mentioned	Not included	AoH1 First AoH report MF1 Regional modeling (2018 base case)

3.0 Apportionment § 308d(3)(iii)			
Plan Component/reference to Road Map	EPA Policy or Guidance	Template or other language (e.g. 309 SIPs) developed/ available	WRAP Strategic Plan or FY05 Work Plan, designated by project number and descriptor in WRAP work plan
Demonstration of state share of emission reductions to meet reasonable progress goal 4, 8 Placeholder	Yes	Some language in Mane-VU template under Long-Term Strategy	IO1 – Reasonable Progress AoH1 Attribution of Haze (inc. weight of evidence) 309(a) – Annex imp.

4.0 Control Measures § 308d(3)(ii) and (e)			
Plan Component and reference to Road Map	EPA Policy or Guidance	Template or other language (e.g. 309 SIPs) developed/ available	WRAP Strategic Plan or FY05 Work Plan, designated by project number and descriptor in WRAP work plan
Emissions Inventory – base case 2002 and 2018 2, 7, 8	Yes	Listed in Appendices	309(a) – Annex imp AMR1, AMR2 VIEWS & Causes of Haze FF6, FF7, FFB, FFC, FFD – fire activities EF1, EF3, EF7(AK) – Emission inventories TW1, TW5 Emissions inventories on Tribal lands DF3, DF4 Dust EI IN1 In/near inventory MF2(AK) Alaska EI
Impacts on Class I areas of concern (base case 2018) 5, 7, 8	Yes		RMC report on 2018 Base case AoH 1, 2 - AoH report
Long-term Strategy - Base Case Measures 5	Yes		EA2 Baseline economic profile FF5 EDMS FF8 Area goals MS1, MS2 Offroad program (credits and retrofits)
Long-term Strategy Additional measures 3, 8, 10, 11	Yes- Fire (including ag. Burning) Dust (particularly construction) Other sources	Yes	WRAP IO2 – Identifying Controls SS5 Additional SS strategies MS3 MS evaluation EA2, EA3, EA4, EA5 Economic analyses AMC3 Health effects FF2 Fire Guidance FF8 Area goals IN2 In/near RP strategies DF5, DF6 Dust control options

4.0 Control Measures § 308d(3)(ii) and (e)			
Plan Component and reference to Road Map	EPA Policy or Guidance	Template or other language (e.g. 309 SIPs) developed/ available	WRAP Strategic Plan or FY05 Work Plan, designated by project number and descriptor in WRAP work plan
BART or alternative 3, 4 List of Bart-Eligible Sources Sources subject to BART analyses Impact of BART sources on Class I areas	Yes	Yes	Stationary Sources Joint Forum 309(a) Annex implementation SS1, SS4, SS5 – BART list and other options

5.0 Consultation and future commitments § 308(f), (g) and (h)			
Plan Component and reference to Road Map	EPA Policy or Guidance	Template or other language (e.g. 309 SIPs) developed/ available	WRAP Strategic Plan or FY05 Work Plan, designated by project number and descriptor in WRAP work plan
Monitoring Plan 10	Yes	Yes –Mane-VUE has included detail in document for states and tribes.	AMR1- VIEWS AMR2 Causes of Haze AoH Phase 2 (technical data portal) FF5 – Fire tracking IMPROVE Network website
Comprehensive Periodic Plan Revisions (ten year SIP updates) 13	Yes	Yes	
Determination of adequacy of existing Plan (five year reviews) 13	Yes	Yes	
State and Federal Land Manager Consultation 9	Yes	Yes	Not an implicit task but organizational structure will provide for that at both a formal and informal level FF9 Regional FLM coordination
State Administrative Procedures and Rulemaking	Yes	Yes	NA
Monitoring Plan 10	Yes	Yes –Mane-VUE has included detail in document for states and tribes.	AMR1- VIEWS AMR2 Causes of Haze AoH Phase 2 (technical data portal) FF5 – Fire tracking IMPROVE Network website
Comprehensive Periodic Plan Revisions (ten year SIP updates) 13	Yes	Yes	

5.0 Consultation and future commitments § 308(f), (g) and (h)			
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Determination of adequacy of existing Plan (five year reviews) 13	Yes	Yes	
State and Federal Land Manager Consultation 9	Yes	Yes	Not an implicit task but organizational structure will provide for that at both a formal and informal level FF9 Regional FLM coordination
State Administrative Procedures and Rulemaking	Yes	Yes	NA

6.0 Appendices			
Technical Support Document			
State and Tribe Rules and Administrative Procedures			
ETC			

Resources for SIP Preparers

1. EPA-approved Long Term Strategy documents – Colorado and other states
2. SIP Templates and draft SIP documents – WESTAR, MANE-VU and CENRAP
3. CFR Part 51 Subpart P—Protection of Visibility
4. Federal Register Vol. 64. No 126 pp. 35714-35774 (CFR Part 51 Regional Haze Rule – Final Rule and accompanying narrative)
5. RPO and other related web sites