



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

AAPCA Best Practice: Georgia SIP Processing Procedures

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BACKGROUND

- **States are responsible for developing and submitting SIP revisions to EPA.**
 - Regulatory aspects (developing the SIP revisions)
 - Administrative aspects (processing the SIP revisions)
- **In early 2016, it was determined that only 1 of our 6 SIP writers could independently develop and process a SIP revision from start to finish.**
 - In addition, this individual was nearing retirement.
- **There were existing SIP procedures, but they were very difficult to follow and needed to be updated and streamlined.**



LSS PROJECT

- **Initiated a lean six sigma (LSS) project in mid-2016 to streamline and document the administrative SIP procedures**
- **LSS team consisted of 8 EPD employees**
 - Diverse group from both inside and outside APB
- **Goals of the project were:**
 - Train 100% of the SIP writers on new procedures by December, 2017.
 - Reduce our internal SIP backlog from 10 to 0, where “SIP backlog” is defined as a SIP revision that is not currently being worked on due to lack of resources.



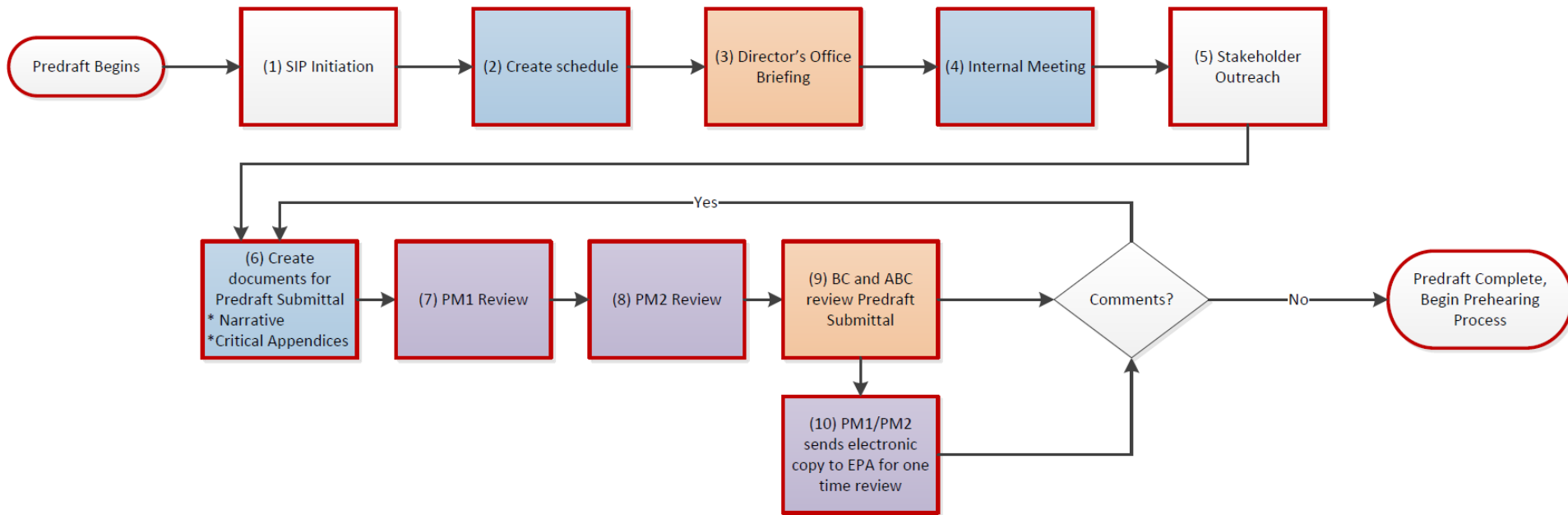
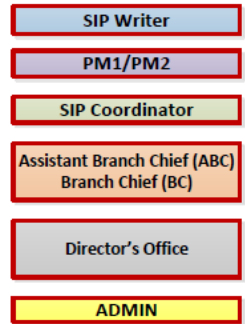
SIP PROCEDURES

- **Step-by-step SIP procedures guide includes:**
 - Detailed flow charts
 - Quick reference guide with additional details
 - Template letters
 - Checklists
- **Three types of SIP revisions**
 - Predraft
 - Prehearing
 - Final



“PREDRAFT” SUBMITTAL

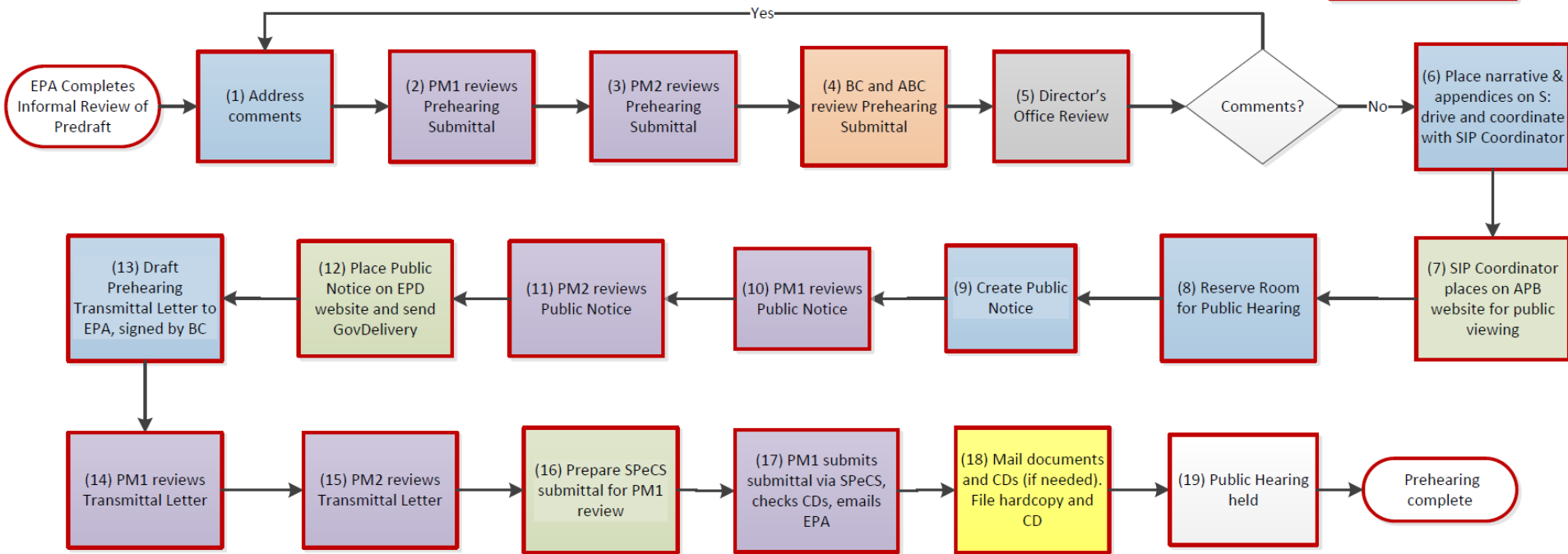
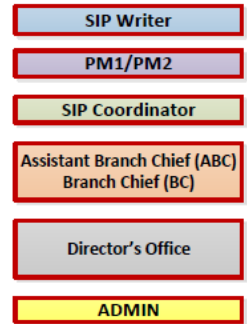
COLOR CODES





“PREHEARING” SUBMITTAL

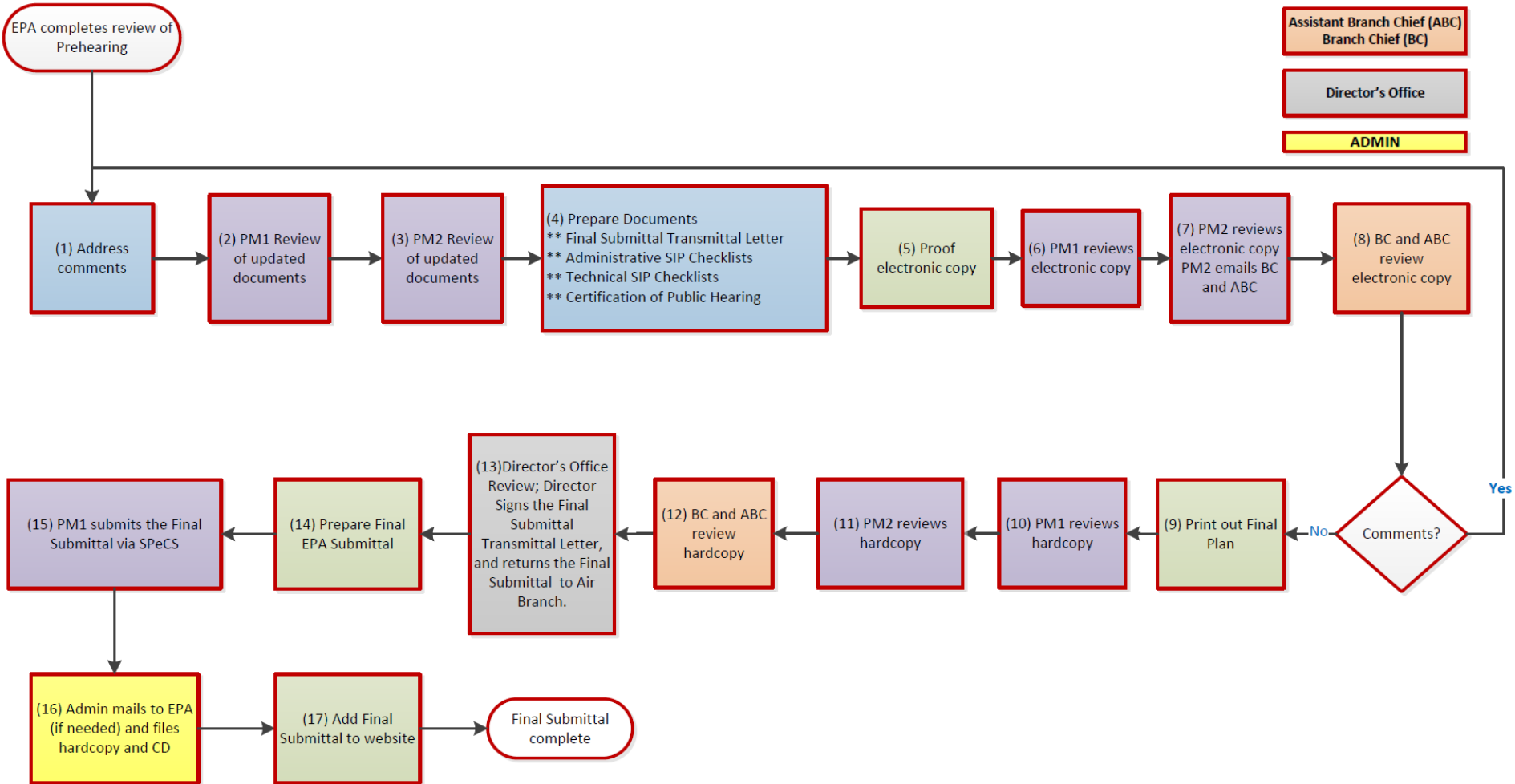
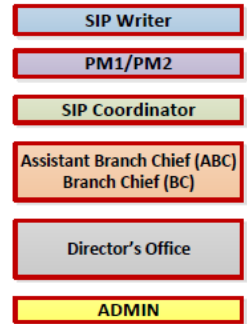
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“FINAL” SUBMITTAL

COLOR CODES





PREDRAFT SIP TRACKING LOG

2 <i>Pre-Draft</i>					
3 Task/Event	4 Scheduled		4 Actual		
	4 Start	4 - End	4 Start	4 - End	
5 Create documents for Pre-draft Submittal:	Tue, Jan 09, 2018	- Mon, Apr 02, 2018	Wed, Jan 10, 2018	- Wed, Mar 14, 2018	Offset and C
6 1) Narrative*					Waiting on
7 2) Critical Appendices					
8 PM1 Reviews Pre-draft Submittal	Mon, Apr 02, 2018	- Fri, Apr 13, 2018	Wed, Mar 14, 2018	- Mon, Apr 09, 2018	Offset and C
9 PM2 Reviews Pre-draft Submittal	Fri, Apr 13, 2018	- Thu, Apr 26, 2018	Mon, Apr 09, 2018	- Thu, May 03, 2018	
10 Air Protection Branch Chief and Assistant Branch Chief Reviews Pre-draft Submittal	Thu, Apr 26, 2018	- Tue, May 15, 2018	n/a	- n/a	This step w
11 PM1 or PM2 sends electronic copy to EPA for comments:	Wed, May 16, 2018	- Fri, Jun 15, 2018	See notes	- n/a	Sent May 4
12 1) Narrative					Sent June 1
13 2) Critical Appendices					EPA respon
14 <i>Pre-Hearing</i>					



PREHEARING SIP TRACKING LOG

Pre-Hearing					
Task/Event	Scheduled		Actual		
	Start	- End	Start	- End	
14					
15					
16					
17	Address Comments		Mon, Jun 18, 2018 - Fri, Jun 29, 2018	Fri, Jun 01, 2018 - Wed, Jun 27, 2018	
18	Propose Public Hearing dates; Reserve Training Room for Public Hearing		Mon, Jun 18, 2018 - Mon, Jul 02, 2018	Thu, Jun 28, 2018 - Thu, Jun 28, 2018	
19	PM1 Reviews Pre-hearing Submittal		Mon, Jul 02, 2018 - Thu, Jul 05, 2018	Wed, Jun 27, 2018 - Thu, Jun 28, 2018	
20	PM2 Reviews Pre-hearing Submittal		Thu, Jul 05, 2018 - Fri, Jul 13, 2018	Wed, Jun 27, 2018 - Thu, Jun 28, 2018	
21	Pre-hearing Submittal is reviewed by Air Protection Branch Chief and Assistant Branch Chief		Fri, Jul 13, 2018 - Mon, Jul 23, 2018	Wed, Jun 27, 2018 - Thu, Jun 28, 2018	
22	Director's Office Review of Pre-hearing Submittal		Tue, Jul 24, 2018 - Fri, Aug 10, 2018	n/a - n/a	This step was s
23	Save on S:drive and coordinate with SIP COORDINATOR to place documents on APB website.		Mon, Aug 13, 2018 - Tue, Aug 14, 2018	Thu, Jun 28, 2018 - Thu, Jun 28, 2018	
24	SIP COORDINATOR places documents on Air Protection Branch website for public viewing.		Wed, Aug 15, 2018 - Wed, Aug 15, 2018	Fri, Jun 29, 2018 - Fri, Jun 29, 2018	
25	Create Public Notice (PN)		Wed, Aug 15, 2018 - Wed, Aug 15, 2018	Tue, Jun 12, 2018 - Tue, Jun 12, 2018	Did not have pu
26	PM1/PM2 Reviews Public Notice		Thu, Aug 16, 2018 - Thu, Aug 16, 2018	Wed, Jun 27, 2018 - Thu, Jun 28, 2018	
27	Place Public Notice on EPD website and send GovDelivery (after review)		Mon, Aug 20, 2018 - Mon, Aug 20, 2018	Fri, Jun 29, 2018 - Fri, Jun 29, 2018	
28	Note: 30-day Public Notice Period Begins				
29	Draft Pre-hearing Transmittal Letter Notifying EPA Region 4 of Public Hearing (signed by BC)		Mon, Aug 20, 2018 - Wed, Aug 22, 2018	Tue, Jun 26, 2018 - Thu, Jun 28, 2018	
30	PM1 Reviews Pre-hearing Transmittal Letter		Mon, Aug 20, 2018 - Wed, Aug 22, 2018	Wed, Jun 27, 2018 - Thu, Jun 28, 2018	
31	PM2 Reviews Pre-hearing Transmittal Letter		Mon, Aug 20, 2018 - Wed, Aug 22, 2018	Wed, Jun 27, 2018 - Thu, Jun 28, 2018	
32	Prepare Hard Copies for PM1 Review		Wed, Aug 22, 2018 - Wed, Aug 22, 2018	Thu, Jun 28, 2018 - Thu, Jun 28, 2018	
33	1) Print out HARDCOPY of entire Pre-hearing Submittal				
34	2) Create and label 3 CDs of everything being sent in Pre-hearing Submittal (CDs MUST exactly match paper copy):				
35	3) Make a HARDCOPY** of the Pre-hearing Submittal for our files				
36	4) Make an electronic copy of the Pre-hearing Submittal for our files and save on S:drive				
37	5) Give official HARDCOPY* Pre-hearing Submittal and CDs to PM1 for final approval				
38	Mail HARDCOPIES, check CDs, email EPA (if necessary)		Wed, Aug 22, 2018 - Wed, Aug 22, 2018	Thu, Jun 28, 2018 - Fri, Jun 29, 2018	Submitted throu
39	PM1 will check Pre-hearing Submittal for completeness and in the correct order:				The entire SIP s
40	1) Check CDs to see if they work and exactly match official HARDCOPY****				Contents larger
41	2) Give the Pre-hearing Submittal documents to ADMIN for mailing				
	3) ADMIN will file HARDCOPY**** and 1 CD of Pre-hearing Submittal (make appropriate				



FINAL SIP TRACKING LOG

		<i>Final Submittal</i>			
Task/Event		Scheduled		Actual	
		Start	End	Start	End
52					
53					
54					
55	Prepare Documents :	Mon, Sep 03, 2018	Thu, Oct 25, 2018	Tue, Jul 10, 2018	Tue, Jul 17, 2018
56	1) Draft Final Submittal Transmittal Letter to EPA	(can be started earlier than Sept 03, 2018)			
57	2) Create Administrative SIP Checklists				
58	3) Create Technical SIP Checklists				
59	- Create Certification of Public Hearing Document				
60	Address all comments that were received on the Pre-hearing Submittal during the public comment period and make associated revisions to the narrative and critical appendices if warranted.	Thu, Oct 04, 2018 -	Thu, Oct 11, 2018	Mon, Aug 06, 2018 -	Tue, Aug 07, 2018
61	PM1 Review of the electronic copy	Fri, Oct 12, 2018 -	Tue, Oct 16, 2018	Tue, Aug 07, 2018 -	Tue, Aug 07, 2018
62	PM2 Review of the electronic copy	Tue, Oct 16, 2018 -	Thu, Oct 18, 2018	Tue, Aug 07, 2018 -	Thu, Aug 09, 2018
63	Complete Final Submittal Letter			Tue, Aug 07, 2018 -	Tue, Aug 07, 2018
64	PM1 Review of the electronic copy	Thu, Oct 25, 2018 -	Mon, Oct 29, 2018	Tue, Aug 07, 2018 -	Tue, Aug 07, 2018
65	PM2 Review of the electronic copy	Mon, Oct 29, 2018 -	Wed, Oct 31, 2018	Tue, Aug 07, 2018 -	Thu, Aug 09, 2018
66	Air Protection Branch Chief and Assistant Branch Chief Review of the electronic copy	Wed, Oct 31, 2018 -	Fri, Nov 02, 2018	Thu, Aug 09, 2018 -	Tue, Aug 14, 2018
67	Print out all documents in Final Submittal for Director Office review.	Mon, Nov 05, 2018 -	Mon, Nov 05, 2018	Mon, Aug 13, 2018 -	Tue, Aug 14, 2018
68	PM1/PM2 Review HARDCOPIES copies of the Final Submittal	Tue, Nov 06, 2018 -	Tue, Nov 06, 2018	Tue, Aug 14, 2018 -	Tue, Aug 14, 2018
69	Air Protection Branch Chief and Assistant Branch Chief Review HARDCOPIES copies of the Final Submittal	Wed, Nov 07, 2018 -	Tue, Nov 13, 2018	Tue, Aug 14, 2018 -	Tue, Aug 14, 2018
70	Director's Office Review HARDCOPIES copies of the Final Submittal	Wed, Nov 14, 2018 -	Fri, Nov 30, 2018	Wed, Aug 15, 2018 -	Wed, Aug 15, 2018
71	Once the Final Submittal signed by the director has arrived back, prepare Final EPA submittal (official hardcopy) and CD.	Mon, Dec 03, 2018 -	Tue, Dec 04, 2018	Wed, Aug 15, 2018 -	Wed, Aug 15, 2018
72	PM1/PM2 review of the Final Submittal (official hardcopy) and CDs	Wed, Dec 05, 2018 -	Thu, Dec 06, 2018	Wed, Aug 15, 2018 -	Wed, Aug 15, 2018
73	Submit to EPA Region 4	Fri, Dec 07, 2018 -	Fri, Dec 07, 2018	Wed, Aug 15, 2018 -	Wed, Aug 15, 2018
74	<u>Final Submittal Hardcopy includes:</u>				
75	- Signed Final Submittal Transmittal Letter from EPD Director to EPA				
76	- Administrative and Technical Checklists				
77	- Certification of Public Hearing				
78	- Copy of the Public Notice				
79	- EPA letter responding to pre-hearing package				
	- Memo to EPD's Director from Air Protection Branch Chief that includes a compilation of				



SIP STATUS BOARD

Quartet

2010 S04:5IP

TCM Annual 10/10

2015 03 15IP

PEERITY APPLICATION FEES

COLOR CODES

- Final Submittal
- BC and ABC Review
- PM1/PM2 Review
- Public Hearing
- PM1 Review
- PM2 Review
- BC and ABC Review
- Director's Office Review
- Comments?
- Place narrative & appendices on S: drive and coordinate with SIP Coordinator
- SIP Coordinator places on APB website for public viewing
- Place Public Notice on EPD website and send GovDelivery
- Draft Pre-Hearing Transmittal Letter to EPA, signed by BC
- Prepare hard copies and CDs for PM1 review
- Mail hard copies, check CDs, email EPA (if necessary)
- Prepare Documents: *Final Submittal Transmittal Letter, *Administrative SIP Checklists, *Technical SIP Checklists, *Certification of Public Hearing
- PM1 Review
- PM2 Review of updated documents
- File Public Hearing Documents in public file
- Address comments
- BC and ABC Review (Hardcopies)
- Director's Office Review: Director Signs the Final Submittal Transmittal Letter, and returns the Final Submittal to Air Branch.
- PM2 Review PM2 email BC and ABC
- BC and ABC Review (Electronic Copy)
- Comments? **MAKE CHANGES.**
- Print out Final Plan
- PM1/PM2 Review (Hardcopies)
- BC and ABC Review (Hardcopies)
- PM1 Review of updated documents
- Prepare Hardcopies and CDs for EPA submission
- PM1/PM2 Review Final Submittal (official hardcopies and CDs) Email EPA (if necessary)
- ADMIN mails to EPA and files hard copies and CDs
- Final Submittal complete

BA SIP Copy Submittal (PM1/PM2) Preparation Instructions

EPA

Final Submittal complete



LESSONS LEARNED

- **Without clear procedures, SIP writers are going to process SIP revisions in different ways**
 - SIP packages are more difficult to review for the SIP coordinator and SIP manager.
 - Inexperienced staff are overwhelmed by their first SIP revision assignments.
- **During the development of the detailed SIP procedures, steps were added, removed, and rearranged to make the process more efficient.**
- **Diverse LSS team allowed for new ideas and perspectives.**



EVALUATION PROCESS

- **Currently, 100% of the SIP staff can independently process a SIP from start to finish.**
- **The time to complete the administrative SIP steps has been reduced by ~50%.**
 - Reduced our internal SIP backlog from 10 to zero
- **Helped solidify our succession planning**
- **Provides greater job satisfaction due to less confusion and frustration.**
- **Managers have more available time to manage other projects.**



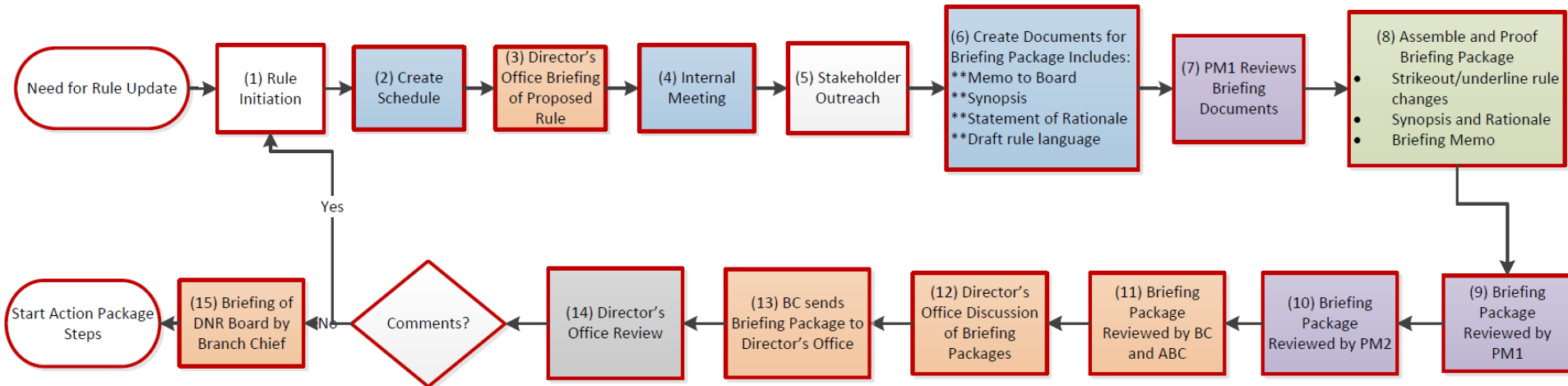
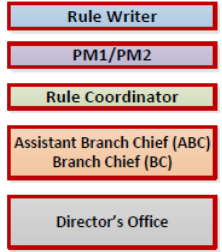
SUSTAINABILITY

- This project required an initial investment of time. However, the increased productivity has more than made up for this initial investment.
- Training new SIP writers is quicker and easier as a result of these new procedures.
- Due to it's success, the SIP procedures project was expanded to include state air quality rulemaking procedures and SIP procedures that include state rulemaking.



STATE RULE "BRIEFING"

COLOR CODES

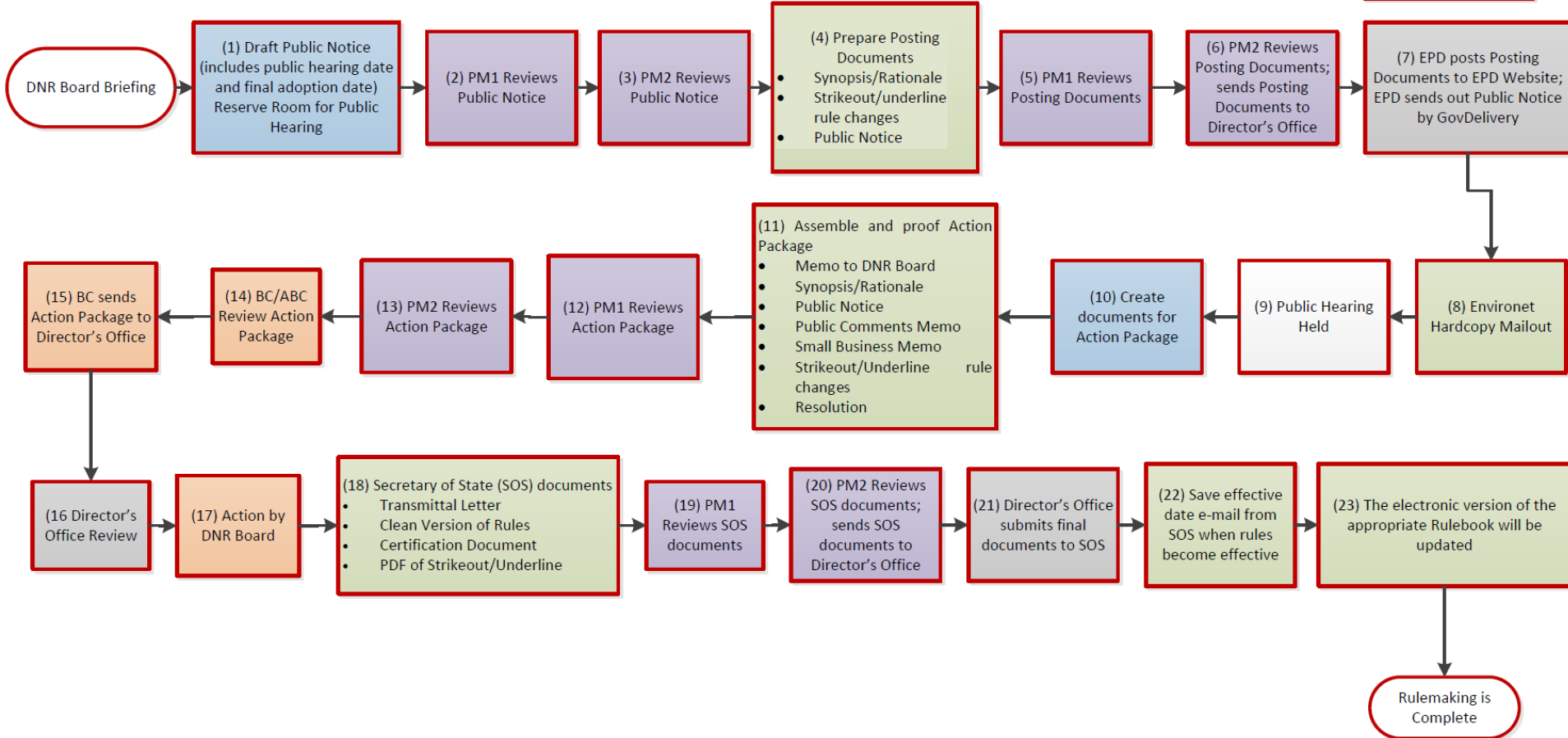




STATE RULE "ACTION"

COLOR CODES

- Rule Writer
- PM1/PM2
- Rule Coordinator
- Assistant Branch Chief (ABC)
Branch Chief (BC)
- Director's Office





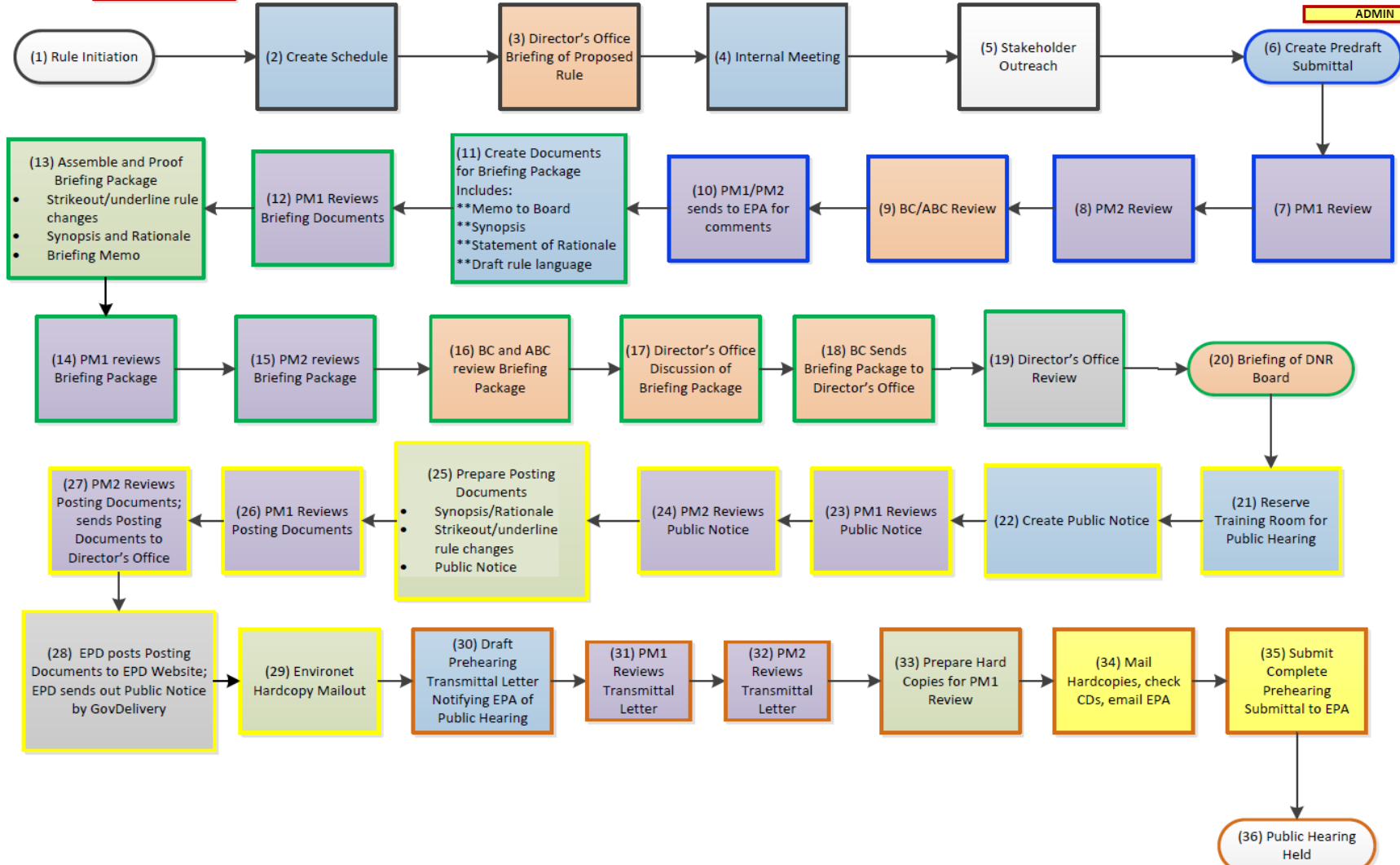
OUTLINE CODES

- Rule Initiation
- Predraft
- Briefing Package
- Public Notice
- Prehearing
- Action Package
- Final Submittal

FILL CODES

- Rule/SIP Writer
- PM1/PM2
- Rule/SIP Coordinator
- Assistant Branch Chief (ABC)
Branch Chief (BC)
- Director's Office
- ADMIN

SIP WITH RULEMAKING (1)





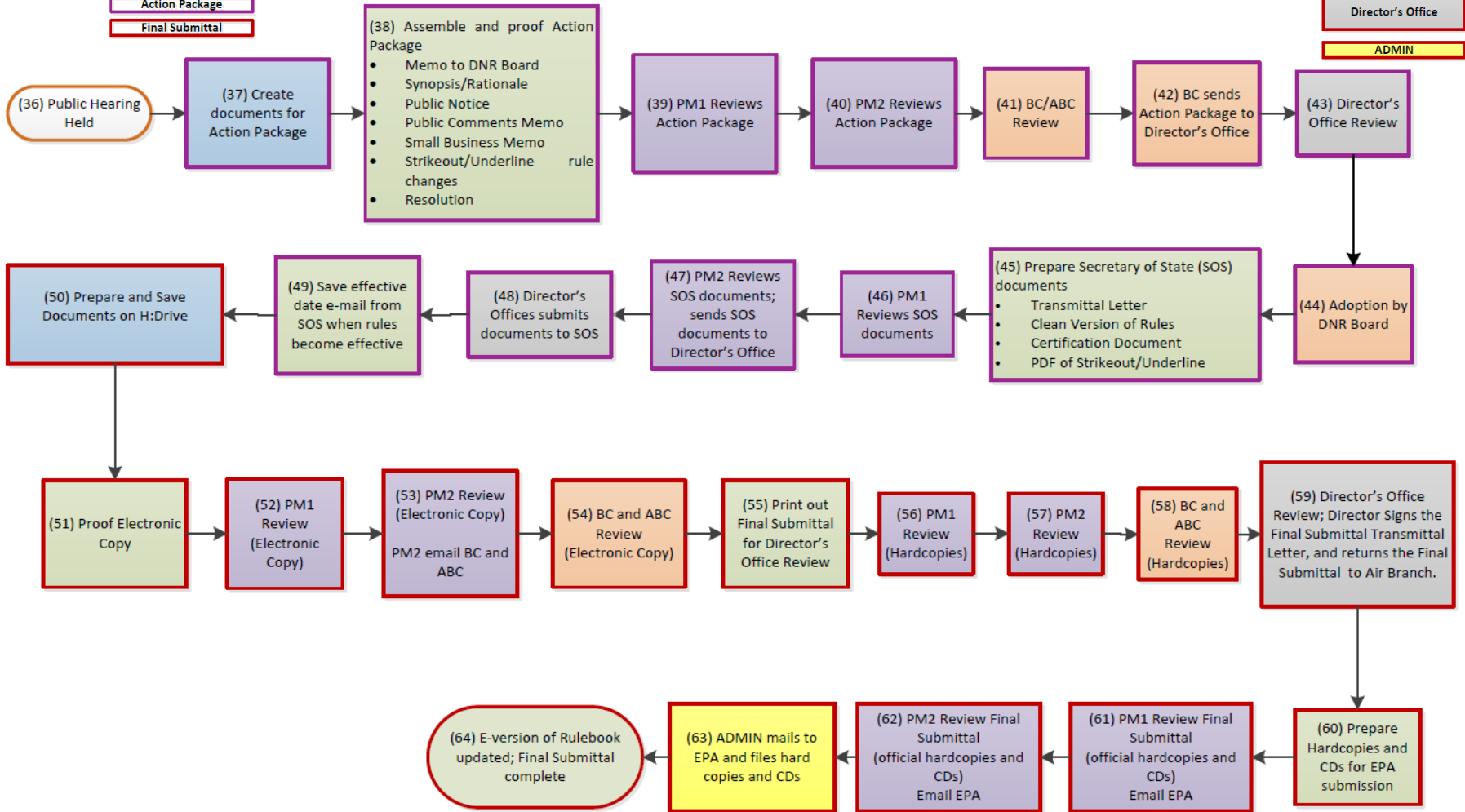
OUTLINE CODES

- Rule Initiation
- Predraft
- Briefing Package
- Public Notice
- Prehearing
- Action Package
- Final Submittal

SIP WITH RULEMAKING (2)

FILL CODES

- Rule/SIP Writer
- PM1/PM2
- Rule/SIP Coordinator
- Assistant Branch Chief (ABC)
Branch Chief (BC)
- Director's Office
- ADMIN





TRANSFERABILITY

- **EPD used existing staff to develop the SIP Procedures.**
 - SIP Procedures template used by PRDU to develop State Rulemaking Procedures (and SIP with Rulemaking).
 - SIP Procedures template used by EPD Land Protection Branch (rulemaking procedures) and EPD Radioactive Materials Program (licensing procedures).
- **Other agencies could easily adopt this practice without additional funds or staffing.**
- **Our SIP Procedures are available for other agencies to use as a template.**



UNIQUENESS

- The segmented step-by-step approach allows the SIP staff to continuously update and improve the procedures.
- We have mounted three enlarged flow charts on magnetic boards in the office hallway.
 - This unique way of tracking projects (in addition to our electronic tracking) allows all APB personnel to immediately view the status of every SIP revision and state air quality rule revision.
 - **Also, it makes tracking SIP revisions and state air quality rulemaking fun!**



STATUS BOARDS





CONTACT INFORMATION

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