



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Streamlined Response to Comments Approach for SIPs



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BACKGROUND

- “On **April 7, 2022**, EPA announced its intent to make findings that certain states have failed to submit regional haze implementation plans for the second planning period. The EPA intends to issue these findings by August 31, 2022. States wishing to avoid inclusion in the Findings of Failure to Submit should submit their second planning period SIPs by **August 15, 2022.**”
- On **April 8, 2022**, the APB Chief asked the Planning & Support Program (PSP) to meet the August 15 deadline.



CHALLENGES

- **Partially drafted Regional Haze SIP had not been worked on in almost a year**
- **Nobody in PSP had any previous experience with Georgia's Regional Haze SIP**
- **Rules require a 60-day FLM consultation, followed by a 30-day public comment period**
- **Needed to finish writing the draft SIP, respond to hundreds of pages of comments, update the final SIP, and get management approval**

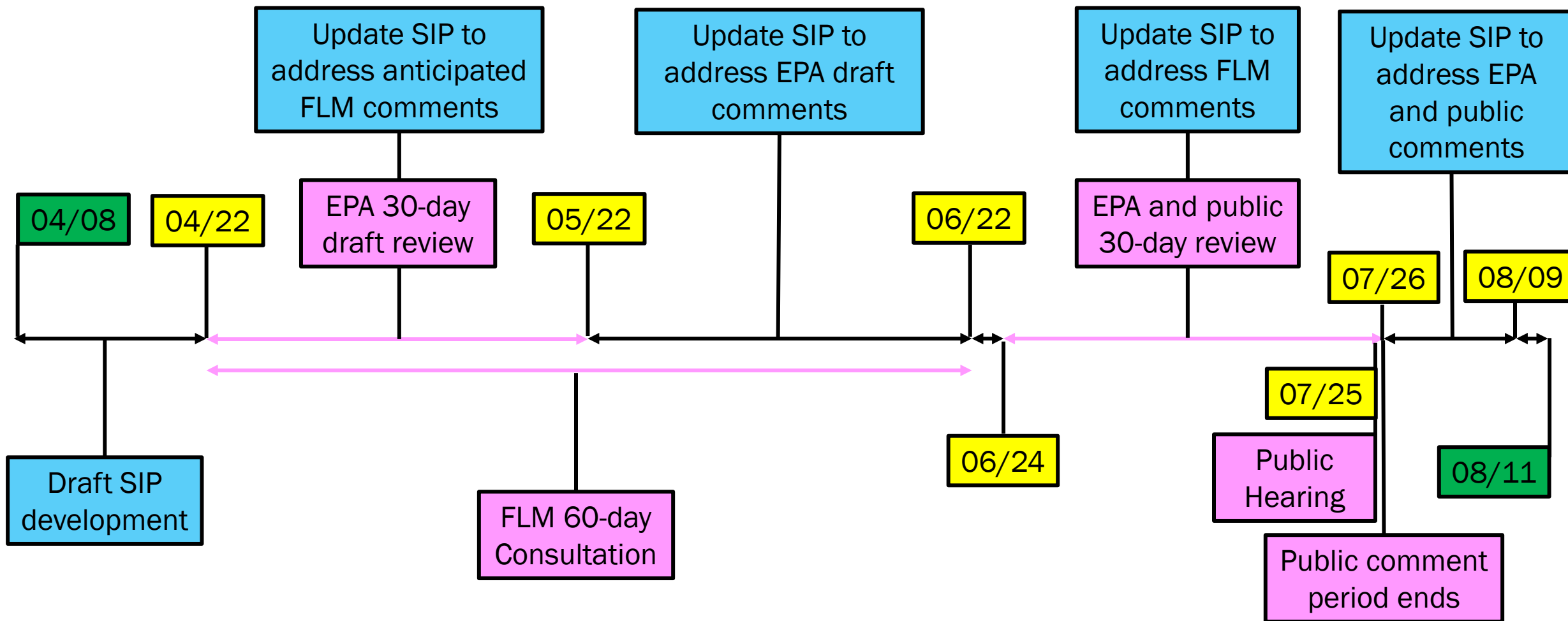


BOTTLENECK – RESPONSE TO COMMENTS

- **After developing an aggressive SIP schedule, it was determined that it was theoretically possible to satisfy all public participation requirements and submit the SIP on time.**
- **However, it was going to be a very tight timeline.**
- **For Georgia EPD to submit our Regional Haze SIP in such a tight timeframe, we had to look at the overall process and see how we could optimize our time.**
- **The part of the process we identified that could potentially take the most time was responding to EPA, FLM, and public comments.**



GEORGIA'S REGIONAL HAZE SIP TIMELINE



GA EPD SIP Updates and Response to Comments

EPA, FLM, and Public Comment Periods



RESPONSE TO COMMENTS – PART 1

- **Since four other states in EPA Region 4 had already completed their RH SIP submittals, Georgia EPD was aware that a large number of public comments would likely be received.**
- **Luckily, Georgia had access to the other states' comments to use as reference.**
- **While Georgia EPD was waiting for comments from the Federal Land Managers (a 60-day process), our SIP writers took all the comments received from the other Region 4 states and created compilation comment documents that could be used to help respond to similar comments received by Georgia.**
- **Our SIP writers streamlined the response process by creating separate comment documents for EPA, Federal Land Managers, and the public.**
- **Within each document, they categorized and consolidated similar comments with answers color coded for each state.**



RESPONSE TO COMMENTS – PART 2

- After our comment periods closed, the compilation comment documents allowed us to very quickly locate comments and responses that were comparable to comments we received during our comment periods and quickly develop consistent and accurate responses to comments from EPA, Federal Land Managers, and the public.
- Having consistency between the other SESARM states was crucial since the states had been working together to develop Regional Haze data, modeling, and SIP language over the years.
- These compilation documents drastically reduced the time required to respond to the numerous comments received and allowed EPD to submit our Regional Haze SIP on time.



LESSONS LEARNED

- **Compiling comments from other states is not a normal procedure, but was essential to EPD's success.**
- **Critical to have a detailed schedule of deliverables based on our previous SIP experience.**
- **Identified the need for more SIP writers, we temporarily expanded our RH SIP team from 2 to 6 people.**
- **All team members worked weekends and evenings.**
- **Assigned duties based on each person's specific skills.**
- **All work was done in parallel, not series, on shared Teams documents.**
- **Good communications was key!**
 - **Frequent team meetings (1-5/week) with additional individual meetings.**



EVALUATION CRITERIA

Evaluation of the Best Practice

- There was not a formal evaluation of this process, but we did produce a high-quality compilation document that allowed us to respond to FLM, EPA, and public comments quickly and efficiently.
- **In the end, we successfully submitted our Regional Haze SIP to EPA four days prior to the August 15 deadline!!**

Sustainability

- Compilation documents are living documents. EPD updated them with our own responses and shared them throughout the U.S.
- This approach can be used for any large project.
- All work was performed in-house with existing staff.



EVALUATION CRITERIA

Transferability

- EPD shared these documents with AAPCA and VISTAS to help other states address the large number of public comments on their RH SIPs.
- Several states have stated that EPD's documents were the reason they were able to finally finish their SIPs and submit them to EPA.
- Also, this same technique can be used across any program that receives a lot of public participation.

Uniqueness

- Georgia was the first state to put all the similar responses to comments into compilation documents.
- The concept is not new, but in the context of Regional Haze it was the first time this had been done.



HOUSE BUILDING EXAMPLE

How long would it take to build a house
if you had unlimited resources?





HOUSE BUILDING EXAMPLE

The 4 Hour House - YouTube



4-HOUR HOUSE vs. 4-MONTH REGIONAL HAZE SIP

Project Management Tool	4-Hour House	4-Month Regional Haze SIP
Create detailed schedule	Start time of each task and duration (based on 2 previous houses)	Detailed schedule of deliverables (based on previous SIP submittals)
Increase number of workers	700 people	2 people → 6 people*
Stay focused on the goal	No breaks during the project	RH SIP was PSP's top priority project Worked nights and weekend (GA comp)
Assign duties based on skills	Construction workers, plumbers, electricians, painters, landscapers	4-factor analysis, permit conditions, NOx impacts, formatting, editing, etc.
Anticipate needs and prepare ahead of time (identify potential bottlenecks)	Materials already on-site, quick-dry cement, etc.	EPD's VISTAS response to comments document (EPA, FLMs, public)
Work in parallel, not series	Foundation, walls, and roof done simultaneously	Used a shared Word doc on Teams to edit the RH SIP simultaneously
Good Communications	Team leaders with workers and other Team leaders	Frequent team meetings (1-5/week) with additional individual meetings

*Steve Allison (PM), Anna Aponte, Delveccio Brown, Ruben Gijon-felix, Terri Hamby, and Jim Boylan



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