SIP Development Plan

Initial date sent to EPA: 11/4/14

Date updated: 11/10/14

**Title**: 2012 PM2.5 annual NAAQS Infrastructure SIP and Interstate Transport Submittal for PM2.5, Pb, SO2, NO2.

**Purpose**: The purpose of this document is to present a basic approach to the SIP development process, including major milestones and due dates. It presents the basic SIP elements the Clean Air Act requires. It also presents any potential issues that will need to be addressed in the process.

**EPA Team**: Kristin Hall and Steve Body (lead), Robert Kotchenruther (technical), Shirin Gallagher (legal)

**ODEQ Team**: Nancy Cardwell (lead), Paul Garrahan/DOJ (legal), Chris Swab and Phil Allen (technical leads).

**Background and Purpose**

On December 14, 2012 EPA strengthened the annual health National Ambient Air Quality Standard (NAAQS) for fine particles to 12.0 micrograms per cubic meter (µg/m3) and retained the 24 hour fine particulate standard of 35 µg/m3. The Clean Air Act requires states to submit an infrastructure SIP to the EPA within 3 years after promulgation or revision of a National Primary Ambient Air Quality Standard. Therefore, an infrastructure SIP is required by December 14, 2015.

The interstate transport provision in the Clean Air Act section 110(a)(2)(D)(i)(I) also requires each state to submit a SIP that prohibits emissions that will have certain adverse air quality effects in other states due within three years of EPA promulgating a new or revised NAAQS. This SIP also addresses obligations under section 110(a)(2)(D)(i)(I) for the 2008 Pb, 2010 NO2, 2010 SO2 and 2012 PM2.5 NAAQS.

**Consultation and Coordination**

DEQ and EPA will periodically consult on these plans throughout the development process.

The SIP updates include the following changes and technical issues:

* Revise Oregon rules to include the 2012 annual PM2.5 standard of 12 µg/m3
* Create a 2012 PM2.5 NAAQS infrastructure cross-walk
* Develop Interstate Transport submittals for the 2008 Pb, 2010 NO2, 2010 SO2 and 2012 PM2.5 NAAQS

**Proposed Schedule**:

As the rulemaking process progresses these dates may change and EPA will be notified of the changes.

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| **Action** | **ODEQ**  **Submit to EPA** | **EPA Feedback**  **Due to ODEQ** |
| Kickoff meeting, discuss revisions and provide preliminary comments on feasibility and suggestions | October 2014 |  |
| DEQ submit SIP Development Plan to EPA [*Ideally, no later than 6 months before DEQ opens its comment period*] | 11/18/14 |  |
| *DEQ submit Technical Analysis Protocol to EPA (if appropriate for this SIP update)* | N/A |  |
| *DEQ submit Inventory Preparation Plan (IPP) (if appropriate for this SIP update)* | N/A |  |
| Meeting: Discuss updated proposed rule revisions, potential issues (technical/legal/policy). | 12/15/14 |  |
| Check-in call | 12/15/14 |  |
| Early rule revisions drafts to EPA | 12/15/14 | 1/1/15 |
| Updated rule revisions drafts and crosswalk to EPA | 1/15/15 | 2/1/15 |
| Meeting: Later rule revisions drafts / follow-up questions | 2/1/15 | 2/1/15 |
| Internal Review (DEQ) | 1/15/15-2/13/15 |  |
| Internal Review (EPA) | 2/1/15 |  |
| Rulemaking Package to EPA for review [*this should occur 90 days before DEQ opens its comment period*] | 2/15/15 | N/A |
| EPA Final Comments due to ODEQ – Internal [*this must occur no later than 45 days before DEQ opens its comment period*] | N/A | 4/1/15 |
| EPA Final Comments Meeting w/ ODEQ | 4/1/15 | 4/1/15 |
| Public Comment Period Opens | 6/15/15 |  |
| Public Hearings | 7/17/15 |  |
| EQC Meeting | 10/21/15 |  |
| Submittal to EPA | 11/1/15 |  |
| Process Evaluation | 12/1/15 |  |

Acknowledged/Agreed by:

EPA: Date:

ODEQ: Date: