

## NJDEP State Implementation Plan (SIP) Transformation

### Summary of Topics Discussed During March 1, 2011 Meeting With External Stakeholders

Chris Salmi, Assistant Director, Air Quality Management, provided opening remarks regarding the goals of transformation, background information on the State Implementation Plan (SIP), the need for external stakeholder involvement and the workload challenges facing the Bureau of Air Quality Planning in the coming years. The Department is operating with a reduced workforce and cannot sustain past and current practices into the future. The SIP process needs to be assessed for procedures that worked in the past and areas for improvement. The program has been challenged to transform the existing SIP to communicate the plan in more understandable terms, focus the plan to the required elements using fewer resources, and eliminate untimely processes. These goals require the program to work with internal stakeholders, external stakeholders, as well as, the United States Environmental Protection Agency (USEPA). There are many National Ambient Air Quality Standards (NAAQS) that will be updated and revised in the near future. New Jersey's interests need to be served to address environmental and economic health.

Stakeholder comments by topic are as follows.

#### 1. **Transparency in SIP Process:**

- (a) The 2005 Reducing Air Pollution Together workgroup for ozone and particulate matter worked well. Since then, the SIP process has not been as transparent. Since the SIP is the NJDEP's roadmap for attainment, stakeholders want to provide input before it gets to the USEPA.
- (b) NJDEP should post a schedule of upcoming opportunities for stakeholder input, key SIP milestones, and anticipated rulemaking on their website. Some of the milestones include draft inventories.
- (c) NJDEP needs to clarify which rules are federally mandated and which rules are chosen by the state to achieve necessary emissions reductions for attainment of the NAAQS.

#### 2. **Inventory:**

- (a) Stakeholders would like a better understanding of the NJDEP's planning targets to be addressed by the SIP to achieve attainment. Stakeholders could better help in the process if a specific planning target was defined.
- (b) Stakeholders are interested in understanding how new reduction strategies are prioritized and selected.

### **3. Rules and Control Measures:**

- (a) Some stakeholders prefer a bright line test for cost effectiveness threshold.
- (b) Stakeholders support lowest-cost, feasible strategies to achieve necessary reductions.
- (c) Benefits accounting should be included.
- (d) There is not much more room at stationary sources to get reductions.
- (e) Stakeholders are interested in understanding how additional control measures are prioritized once Reasonably Available Control Technology (RACT) measures are completed.
- (f) Stakeholders want to weigh in on rule priorities before they become commitments in the SIP. Stakeholders pay more attention to rule actions, and they want to be involved early in the process.

### **4. Communication:**

- (a) The context of listserv notices regarding the SIP is sometimes hard to determine. The listserv notices need to distill the message into language that stakeholders understand.
- (b) A half day workshop would be helpful for stakeholders. Workshop could develop an efficient message, align milestones, put pieces together, and address next steps for control measures and rules.