



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

November 19, 2021

OFFICE OF  
AIR AND RADIATION

**MEMORANDUM**

**SUBJECT:** Addendum to the Office of Air and Radiation's August 19, 2021 Response Titled: EPA Revised Response to OIG Report titled: "EPA Has Reduced Its Backlog of State Implementation Plans Submitted Prior to 2013 but Continues to Face Challenges in Taking Timely Final Actions on Submitted Plans"

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**TO:** Renee McGhee-Lenart  
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After further discussion with the Office of the Inspector General (OIG) on October 18, 2021, the Office of Air and Radiation (OAR) is providing a supplement to its August 19, 2021 response to Recommendation 2 on developing and implementing a plan to ensure timely action on State Implementation Plan submittals.

In our discussion with the OIG on October 18<sup>th</sup>, OAR provided additional details regarding the rigor and duration of various efforts to improve the SIP approval process, which has included working with states through the NACAA-ECOS SIP Reform Workgroup, tracking SIP actions and progress on the SIP backlog across all regional offices, and a large scale kaizen event involving EPA staff from regions and headquarters as well as four representatives from state and local air agencies that led to the development of the SIP Lean Toolkit which encourages early engagement between EPA and air agencies as the key to expediting the SIP approval process.

Review of data gathered from tracking and monitoring the types and trends of pending and upcoming SIP actions and the progress made on the SIP backlog along with the entire body of process improvements led regional leadership, OAR senior leadership, and EPA's Chief Operating Officer at the time to conclude that further significant improvements in the timeliness of SIP approvals would require additional resources. Potential shifts of resources from headquarters to regions were discussed but determined not to be feasible given the greater reduction of FTE sustained by the headquarters air program during successive years of resource reductions relative

to regional air program FTE reductions, as well as multiple competing priorities at the national level. While potential shifts of resources between regions might temporarily reduce some workload disparities, they would not address the overall lack of adequate regional resources for SIP work, and could be more efficiently be accomplished via worksharing.

These considerations resulted in the Agency's decision to provide eight new FTE to Region 9 in the FY2021 Operating Plan and the air program continued its aggressive pursuit of additional regional FTE in the President's Budget for FY2022. Whether the Agency will receive additional resources as requested is dependent on the outcome of the appropriations process. If needed FTE are not provided in FY2022, the air program will aggressively seek the necessary increases in FY2023 and is prepared to pursue work sharing within and among regional staff to deal with regional workload disparities as laid out in the previous response.

The discussion on October 18<sup>th</sup> also provided additional details regarding the way Region 9 has used worksharing to address state and local permit rules related to SIPs and to assist with review of exceptional events demonstrations providing the OIG with a clearer understanding of how the worksharing process is managed. During monthly air program meetings, the regions and headquarters discuss ongoing topics of importance, including resource needs. As priority issues surface in these meetings or elsewhere, the regions cooperate to share resources, as appropriate and subject to availability. These work sharing arrangements are and will continue to be used to alleviate workload issues related to SIP reviews among the regions.

If you have any questions regarding this response, please contact JoLynn Collins, OAQPS/OAR Audit Liaison, at (919) 541-0528.

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