

Detailed Lean Improvement Project Report

For the June 1, 2014, through December 31, 2014, reporting period

Agency name:

Environmental Protection Agency, Region 10
Department of Ecology, Air Quality Program

Improvement project title:

Air Quality State Implementation Plan Rule-Making Process

Date improvement project initiated:

07/2012

Summary:

The Environmental Protection Agency Region 10 (EPA) and Department of Ecology's Air Quality Program improved the State Implementation Plan rule-making process resulting in faster EPA review and approval times. For example, review and approval time of simple and non-controversial rules by EPA was reduced from 12 months to 3 months.

Details:

Description of the problem: EPA's and Ecology's process to review and approve state rules into the State Implementation Plan is complex and time consuming. Several barriers were identified that delayed Ecology's submittal of rules to EPA for review and EPA's ability to approve the rules for the State Implementation Plan. Barriers included:

- Conflicting agency priorities;
- Different interpretations of complex EPA regulations;
- Lack of staff resources and staff turnover at both agencies;
- Lack of understanding of each agency's internal processes; and
- Statute driven administrative requirements for adopting rules and approving State Implementation Plans.

Description of the improvement: Each agency mapped out their internal processes. We identified the points on the rule-making timeline where EPA engagement was most beneficial to ensure the final rule addressed their concerns and met the State Implementation Plan review and approval requirements. Improvement ideas implemented from this Lean event include:

- Sorting the review requests into three categories for appropriate level of review:
 - Fast track for simple and noncontroversial submittals.
 - Normal for submittals that are more complex than the fast track but are not controversial.
 - High involvement for complicated and controversial submittals.



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- New standard rule-making and review timelines that establish the points of engagement between Ecology and EPA staff.

Specific results achieved: The EPA completed several reviews under the fast track category within 3 months of Ecology submitting the request for review. Historically these have taken up to 12 months. Additionally, engaging at the appropriate points during the rulemaking saved as much as 18 months by avoiding the need for Ecology to reopen the rule for additional revisions.

How we involved customers or stakeholders in this effort:

This was an EPA sponsored Lean Event. Ecology was the customer.

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