



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


OFFICE OF  
INSPECTOR GENERAL

March 25, 2020

**MEMORANDUM**

**SUBJECT:** Notification of Evaluation:  
Status of Clean Air Act State Implementation Plan Submittals and Approvals  
Project No. OA&E-FY20-0125

**FROM:** James Hatfield, Director  
Air Directorate  
Office of Audit and Evaluation



**TO:** Anne Idsal, Principal Deputy Assistant Administrator  
Office of Air and Radiation

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin fieldwork on the subject evaluation. Although this evaluation is a discretionary, self-initiated assignment, the Inspector General has received requests related to this topic from members of Congress, and we have considered those requests when planning the scope of our work.

The OIG's objectives are to determine the:

1. Number of Clean Air Act State Implementation Plans awaiting EPA approval.
2. Factors causing delays in SIP approvals.
3. Extent to which states have not submitted the required SIPs to the EPA.
4. Potential impact of delays in SIP processing on achieving the EPA's National Ambient Air Quality Standards.
5. Steps the EPA is taking to address delays in SIP processing.

The OIG plans to conduct work at the Office of Air and Radiation in Research Triangle Park and EPA headquarters, at select EPA regions, and at select state and local agencies. To answer Objective 1, we plan to obtain information on all SIPs awaiting approval, specifically those that the Agency has not processed timely, as well as those that a state has not submitted or corrected timely. For Objective 3, when states have not submitted SIPs or the EPA has disapproved SIPs, we plan to determine whether the Agency has prepared a Federal Implementation Plan. We will determine our approach for answering Objective 4 after we have started our work and obtained additional information regarding Objectives 1 through 3.

The evaluation will be conducted using *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency. The anticipated benefits of this project include improving any identified weaknesses in the EPA's SIP submittal and approval process and identifying state-specific factors contributing to delays in SIP submittals. Furthermore, improvements in SIP processing may reduce the resource demands placed on the EPA and state and local agencies, as well

as allow for faster implementation of federally enforceable conditions to achieve the EPA's National Ambient Air Quality Standards.

We will contact you to arrange a mutually agreeable time to discuss our objectives. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the evaluation process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the evaluation. Throughout the evaluation, we will provide updates on a regular basis.

To expedite our evaluation, please provide us with, or refer us to the locations of, the following information before or at the entrance conference:

- EPA policies, procedures, and guidance related to:
  - Reviewing and approving SIPs.
  - Developing Federal Implementation Plans.
  - Imposing Clean Air Act sanctions and consequences identified in Section 179 of the Act.
- Access to any EPA databases or data files that track SIP submittal, status, and processing.
- Office of Air and Radiation fiscal years 2019 and 2020 program budgets and resources for SIP processing.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. We will request that you resolve the situation if an Agency employee or contractor refuses to provide requested records to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the Administrator and include the incident in the *Semiannual Report to Congress*.

I will supervise the evaluation, and the project manager will be Renee McGhee-Lenart. Any information related to the project should be addressed to me at (919) 541-1030 or [hatfield.jim@epa.gov](mailto:hatfield.jim@epa.gov) or to Renee McGhee-Lenart at (913) 551-7534 or [mcghee-lenart.renee@epa.gov](mailto:mcghee-lenart.renee@epa.gov).

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