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### What Is a SIP?

The Clean Air Act (CAA or Act) at section 110 requires states to develop air pollution regulations and control strategies to ensure that state air quality meets the national ambient air quality standards established by EPA. These ambient standards are established under section 109 of the CAA, and they currently address six criteria pollutants. These pollutants are: Carbon monoxide, nitrogen dioxide, ozone, lead, particulate matter, and sulfur dioxide.

Each state must submit these regulations and control strategies to us for approval and incorporation into the Federally-enforceable SIP.

Each Federally-approved SIP protects air quality primarily by addressing air pollution at its point of origin. These SIPs can be extensive, containing state regulations or other enforceable documents and supporting information such as emission inventories, monitoring networks, and modeling demonstrations.

### What Is the Federal Approval Process for a SIP?

In order for state regulations to be incorporated into the Federally-enforceable SIP, states must formally adopt the regulations and control strategies consistent with state and Federal requirements. This process generally includes a public notice, public hearing, public comment period, and a formal adoption by a state-authorized rulemaking body.

Once a state rule, regulation, or control strategy is adopted, the state submits it to us for inclusion into the SIP. We must provide public notice and seek additional public comment regarding the proposed Federal action on the state submission. If adverse comments are received, they must be addressed prior to any final Federal action by us.

All state regulations and supporting information approved by EPA under section 110 of the CAA are incorporated into the Federally-approved SIP. Records of such SIP actions are maintained in the Code of Federal Regulations (CFR) at Title 40, Part 52, entitled "Approval and Promulgation of Implementation Plans." The actual state

regulations which are approved are not reproduced in their entirety in the CFR outright but are "incorporated by reference," which means that we have approved a given state regulation with a specific effective date.

### What Are the Criteria for Approval of a Maintenance Plan?

The requirements for the approval and revision of a maintenance plan are found in section 175A of the CAA. A maintenance plan must provide a demonstration of continued attainment including the control measures relied upon, provide contingency measures for the prompt correction of any violation of the standard, provide for continued operation of the ambient air quality monitoring network, provide a means of tracking the progress of the plan, and include the attainment emission inventory and new budgets for motor vehicle emissions.

### What Does Federal Approval of a State Regulation Mean to Me?

Enforcement of the state regulation before and after it is incorporated into the Federally-approved SIP is primarily a state responsibility. However, after the regulation is Federally approved, we are authorized to take enforcement action against violators. Citizens are also offered legal recourse to address violations as described in section 304 of the CAA.

### What Is in the State's Plan To Maintain the Standard?

For the past ten years, Kansas has had a plan in place to maintain the 1-hour ozone standard in the Kansas portion of the Kansas City maintenance area through 2002. The CAA requires that the maintenance plan be revised to provide for maintenance for ten years after the expiration of the initial maintenance period. Kansas' submittal of December 17, 2002, contained a revised plan that describes what will be done during the next ten-year period to maintain the ozone standard in the Kansas portion of the Kansas City maintenance area through 2012. The following analyses will look at the elements necessary for approval of a maintenance plan and determine if they have been fulfilled.

#### 1. Demonstration of Continued Attainment

This revised plan relies on an attainment level of emissions of volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>) to maintain the ozone standard through a combination of control measures. These measures include stationary, area and mobile

source controls. The annual emissions from the entire area for 1999, a period when no excursions or violations of the standard occurred, and 2012, the last year of the maintenance plan, are shown in the table below.

#### EMISSIONS IN THE KANSAS CITY MAINTENANCE AREA

Year	Pollutant emission (tons per OSD <sup>1</sup> )		
	VOC	NO <sub>x</sub>	CO
1999 .....	367.35	424.2	1706.0
2012 .....	335.55	373.4	1337.8

<sup>1</sup>The term ozone summer day is abbreviated as OSD.

As can be seen, total emissions decreased during the ten-year maintenance period. Thus the plan has demonstrated that the 1-hour ozone standard will be maintained. The full emissions benefits obtained from state and Federal control measures are included in the table above. For the demonstration of maintenance, it is only necessary for the state to show that there is no increase in the emissions. Clearly excess emission benefits are included in the demonstration.

Control measures used to reduce emissions and maintain the standard are shown in the following list. These measures include stationary, mobile and area source controls.

#### LIST OF STATE RULES

State rules	Title
28-19-61 ..	Definitions.
28-19-62 ..	Testing procedures.
28-19-63 ..	Automobile and light duty truck surface coating.
28-19-64 ..	Bulk gasoline terminals.
28-19-65 ..	Volatile organic compounds liquid storage in permanent fixed roof tanks.
28-19-66 ..	Volatile organic compounds liquid storage in external floating roof tanks.
28-19-67 ..	Petroleum refineries.
28-19-68 ..	Leaks from petroleum refinery equipment.
28-19-69 ..	Cutback asphalt.
28-19-70 ..	Leaks from gasoline delivery vessels and vapor collection systems.
28-19-71 ..	Printing operations.
28-19-72 ..	Gasoline dispensing facilities.
28-19-73 ..	Surface coating of miscellaneous metal parts and products and metal furniture.
28-19-74 ..	Wool fiberglass manufacturing.
28-19-76 ..	Lithography printing operations.
28-19-77 ..	Chemical processing facilities that operate alcohol plants or liquid detergent plants.
28-19-714	Solvent metal cleaning.