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Eldon Heaston, Executive Director

Mojave Desert Air Quality Management District
Federal Negative Declaration (8 hr Ozone Standard) for
Nineteen CTG Categories

The Federal *Clean Air Act* (FCAA) requires areas designated non-attainment for ozone and classified moderate and above to adopt, maintain rules requiring certain sources of air pollution to implement Reasonably Available Control Technology (RACT). Rules are required for all sources of Volatile Organic Compounds (VOCs) and Oxides of Nitrogen (NOx) in source categories covered by a Control Techniques Guideline (CTG) document issued by the U. S. Environmental Protection Agency (USEPA) and for any other major stationary sources of VOCs located within the affected area (42 U.S.C. §7511a(b)(2); FCAA 182(b)(2)). If a rule is unnecessary because a source category does not exist within the affected area USEPA requires the submission of a Federal Negative Declaration to certify that those sources are not present. The FCAA requires areas designated non-attainment and classified moderate and above to implement RACT for sources subject to Control Technique Guidelines (CTG) documents issued by EPA for "major sources" of volatile organic compounds (VOCs) and oxides of nitrogen (NOx) which are ozone precursors. Effective May 27, 2008 (73 FR 16436, March 27, 2008), USEPA lowered the primary ozone National Ambient Air Quality Standard (NAAQS) from 0.084 parts per million (ppm) to 0.075 ppm. For purposes of the FCAA, portions of the District have been designated non-attainment for ozone and classified as Severe-15 for the new 0.075 ppm 8-hour standard. As a result of the shift to the 0.075 ppm standard, USEPA is requiring that all non-attainment areas submit an updated RACT SIP Analysis. The purpose of the *RACT SIP Analysis* is to ensure that District Rules adequately address current RACT requirements.

On July 1, 1993 the MDAQMD was formed pursuant to statute. Pursuant to statute it also retained all the rules and regulations of the SBCAPCD until such time as the Governing Board of the MDAQMD wished to adopt, amend or rescind such rules. The MDAQMD Governing Board, at its very first meeting, reaffirmed all the rules and regulations of the SBCAPCD. Since SIP revisions in California are adopted by USEPA as effective in areas which happen to be defined by both air basin designations and the jurisdictional boundaries of local air districts within those air basins, the MDAQMD "inherited" the SBCAPCD SIP which was in effect for what is now called the San Bernardino County Portion of MDAB. One of the provisions of the legislations which created the MDAQMD allowed areas contiguous to the MDAQMD boundaries and within the same air basin to leave their current air district and become a part of the

MDAQMD. On July 1, 1994 the area commonly known as the Palo Verde Valley in Riverside County, including the City of Blythe, left SCAQMD and joined the MDAQMD. Since USEPA adopts SIP revisions in California as effective within the jurisdictional boundaries of local air districts, when the local boundaries change the SIP as approved by USEPA for that area up to the date of the change remains as the SIP in that particular area. Upon annexation of the Blythe/Palo Verde Valley the MDAQMD acquired the SIP prior to July 1, 1994 that was effective in the Blythe/Palo Verde Valley. Therefore, the SIP history for the Blythe/Palo Verde Valley Portion of the MDAQMD is based upon the rules adopted and approved for that portion of Riverside County by SCAQMD. Thus, the MDAQMD is required to either retain RACT rules or to submit a Federal Negative Declaration to certify that there are no such sources in the particular source category within its jurisdiction.

The MDAQMD has examined its permit files, emissions inventory and other documentation and has determined that there are no sources in the nineteen source categories referenced in attachment A, located within the jurisdiction of the MDAQMD and none are anticipated in the near future. The District is also proposing to remove two previously submitted FNDs, because while the District has no offset lithography sources or fabric coating sources, Rule 1117 – *Graphic Arts and Paper, Film, Foil and Fabric Coatings* has provisions for the categories and the rule has been approved as RACT.

I certify on behalf of the MDAQMD that, to my knowledge, the MDAQMD does not have any major stationary sources in the referenced categories located within the jurisdiction of the District. Therefore the MDAQMD requests the USEPA to approve this Federal Negative Declaration for the 8 hour Ozone Standard and include it in the State Implementation Plan for the MDAQMD.

Eldon Heaston
Executive Director

1/13/2018
Date

Source Category	CTG/Guidance Document Covering Action
New FNDs	
Metal Furniture Coating	1. Control of Volatile Organic Emissions from Existing Stationary Sources – Volume III: Surface Coating of Metal Furniture (EPA - 450/2-77-032, 12/77). 2. Control Techniques Guidelines for Metal Furniture Coatings (EPA - 453/R-07-005, 09/07).
Flat Wood Paneling	1. Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VII: Factory Surface Coating of Flat Wood Paneling (EPA-450/2-78-032, 06/78). 2. Control Techniques Guidelines for Flat Wood Paneling Coatings (EPA – 453/R-06-004, 09/06).

FNDs to Update	
Large Petroleum Dry Cleaners	Control of VOC Emissions from Large Petroleum Dry Cleaners (EPA-450/3-82-009, 9/82, NTIS PB-83-124-875), CTG.
Manufacture of High Density Polyethylene, Polypropylene, and Polystyrene Resins	Control of VOC Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins (EPA-450/3-83-008, 11/83, NTIS PB-84-134-600), CTG.
Pneumatic Rubber Tire Manufacturing	Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires (EPA-450/2-78-030, 12/78, NTIS PB-290-557), CTG.
Surface Coating of Cans	Control of Volatile Organic Emissions from Existing Stationary Sources-Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 5/77, NTIS PB-272-445), CTG.
Surface Coating of Coils	Control of Volatile Organic Emissions from Existing Stationary Sources-Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 5/77, NTIS PB-272-445), CTG.

Surface Coating Operations at Automotive and Light Duty Truck Assembly Plants	1. CTG for Automobile and Light-Duty Truck Assembly Coatings (EPA 453/R-08-006, 09/08) 2. Protocol for Determining the Daily VOC Emission Rate of Automobile and Light-Duty Truck Primer-Surfacer and Topcoat Operations (EPA 453/R-08-002, 09/08) 3. Control of Volatile Organic Emissions from Existing Stationary Sources – Vol. II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 05/77, NTIS PB-272-445)
Surface Coating of Large Appliances	1. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume V: Surface Coating of Large Appliances (EPA-450/2-77-034, 12/77, NTIS PB-278-259), CTG. 2. Control Techniques Guidelines for Large Appliance Coatings (EPA 453/R-07-004, 09/07).
Surface Coating of Magnet Wire	Control of Volatile Organic Emissions from Existing Stationary Sources, Volume IV: Surface Coating of Insulation of Magnet Wire (EPA-450/2-77-033, 12/77, NTIS PB-278-258), CTG.
Vacuum Producing Devices or Systems	Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds (EPA-450/2-77-025, 10/77, NTIS PB-275-662), CTG.
Leaks From Petroleum Refinery Equipment	Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds (EPA-450/2-77-025, 10/77, NTIS PB-275-662), CTG.
Process Unit Turnarounds	Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds (EPA-450/2-77-025, 10/77, NTIS PB-275-662), CTG.
Equipment Leaks From Natural Gas/Gasoline Processing Plants	Control of VOC Equipment Leaks from Natural Gas/Gasoline Processing Plants (EPA-450/3-83-007, 12/83, NTIS PB-84-161-520), CTG.
Synthesized Pharmaceutical Products	1. Control Techniques for VOC Emissions from Stationary Sources: Industrial Manufacturing Processes (EPA-453/R-92-018, 12/92, NTIS PB-93-150-258). 2. Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products (EPA-450/2-78-029, 12/78, NTIS PB-290-580), CTG.
Air Oxidation Processes – Synthetic Organic Chemical Manufacturing Industry	Control of VOC Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry (EPA-450/3-84-015, 12/84, NTIS PB-85-164-275), CTG.

Reactor Processes and Distillation Operations in SOCMI	Control of VOC Emissions from Reactor Processes and Distillation Operations in SOCMI (EPA-450/04-91-031, 08/93, NTIS PB-92-180-009), CTG.
Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment	Control of VOC Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment (EPA-450/3-83-006, 03/84, NTIS PB-84-189-372), CTG.
Petroleum Refinery Equipment	Control of VOC Leaks from Petroleum Refinery Equipment (EPA-450/2-78-036, 06/78, NTIS PB-286-158), CTG.

FNDs to Remove	
Offset Lithographic Printing *While the District has no offset lithography sources, Rule 1117 has provisions for the categories and the rule has been approved as RACT.*	1. CTG for Offset Lithographic Printing and Letterpress Printing (EPA-453/R-06-002, 09/06). 2. Control of Volatile Organic Emissions from Existing Stationary Sources-Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 5/77, NTIS PB-272-445), CTG.
Surface Coating of Fabrics *While the District has no fabric coating sources, Rule 1117 has provisions for the categories and the rule has been approved as RACT.*	1. CTG for Offset Lithographic Printing and Letterpress Printing (EPA-453/R-06-002, 09/06). 2. Control of Volatile Organic Emissions from Existing Stationary Sources-Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 5/77, NTIS PB-272-445), CTG.