Mojave Desert Air Quality Management District
14306 Park Avenue, Victorville, CA 92392-2310
760.245.1661 • fax 760.245.2699
Visit our web site: http://www.mdaqmd.ca.gov
Eldon Heaston, Executive Director

May 26, 2015

Carol Sutkus
State of California
Environmental Protection Agency
Air Resources Board
P. O. Box 2815
Sacramento, California 95812

Project Title: Adoption of MDAQMD *2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis)*

Dear Ms. Sutkus:

The Mojave Desert Air Quality Management District (MDAQMD) requests that the California Air Resources Board submit the MDAQMD *2015 8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis)* to the United States Environmental Protection Agency (USEPA) for inclusion in the State Implementation Plan (SIP).

The Federal Clean Air Act (FCAA) requires areas designated non-attainment and classified moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Technique Guidelines (CTG) documents issued by the USEPA for "major sources" of volatile organic compounds (VOCs) and oxides of nitrogen (NO_X) 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 8-hour ozone standard. As a result of this change, USEPA is requiring that all non-attainment areas adopt and submit an updated *RACT SIP Analysis* to ensure that District Rules adequately address current RACT requirements.

In 2006 the MDAQMD adopted the *8-Hour Reasonably Available Control Technology – State Implementation Plan Analysis (RACT SIP Analysis)* in response to change on March 9, 2006 of the previous ozone standard from measurement on a one- hour basis (1-hour ozone standard) to an eight-hour basis (8-hour ozone standard). On September 14, 2006, USEPA provided comments on the 2006 *RACT SIP Analysis* requesting additional analysis on several rules to determine if they still represented RACT. On February 25, 2014, the MDAQMD sent the *2014 Supplement to the 2006 MDAQMD RACT SIP Analysis* addressing these comments and providing the requested analysis of those rules identified by USEPA. This update was not acted on by the Governing Board pursuant to USEPA direction.

The MDAQMD has now adopted an updated *2015 RACT SIP Analysis* for the 2008 0.075 ppm 8-hour ozone NAAQS. The information contained in the original 2006 *RACT SIP Analysis*, the information in the supplemental *2014 RACT SIP Analysis*, together with this document, will comprise an analysis sufficient to satisfy the *RACT SIP Analysis* request for the 0.075 ppm 8-hour ozone NAAQS.

If you have any questions regarding this submittal, please contact me at (760) 245-1661, extension 6726, or Tracy Walters at extension 6122. Please note that all documents required for a complete submission were sent electronically on May 26, 2015.

Sincerely,

Alan J. De Salvio
Deputy Director – Mojave Desert Operations

AJD/tw CARB SIP Submittal Request 2015 RACT SIP