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# REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT)

# STATE IMPLEMENTATION PLAN (SIP) REVISION

**FOR**

# WESTERN NEVADA COUNTY

# 8-HOUR OZONE NONATTAINMENT AREA

# EVALUATION OF ADEQUACY FOR 2008 OZONE NATIONAL AMBIENT AIR QUALITY STANDARDS AND NEGATIVE DECLARATIONS FOR CONTROL TECHNIQUES GUIDELINES FOR BULK GASOLINE PLANTS; THE OIL AND NATURAL GAS INDUSTRY; STORAGE OF PETROLEUM PRODUCTS IN FIXED ROOF TANKS; AND OTHER CONTROL TECHNIQUES GUIDELINES

Submitted in Partial Fulfillment of Requirements under the Federal Clean Air Act

**Date for Public Hearing:** **March 26, 2018**

**Date for Adoption:** **Same as Public Hearing (unless comments received necessitate modification)**

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## EXECUTIVE SUMMARY

This submission addresses Reasonably Available Control Technology (RACT) nonattainment requirements for the 2008 federal 8-hour Ozone National Ambient Air Quality Standard (NAAQS). The Northern Sierra Air Quality Management District (NSAQMD) has evaluated RACT and Control Techniques Guidelines (CTGs) applicability for all of its stationary sources. In the time that has passed since the NSAQMD's previous RACT rule adoptions and negative declarations (for the 1997 Ozone NAAQS), there have been no changes in the nonattainment boundary. No additional sources that are subject to any of the heretofore promulgated CTGs or could potentially exceed the CTGs' de minimis thresholds (15 lbs. per day of precursors for most source categories) have become established or significantly increased production in the area. The table at the end of this document lists all CTGs that EPA has published and indicates for each one if a negative declaration is being proposed or if it has been addressed in another manner.

The NSAQMD has re-evaluated two CTGs addressed in its 2007 RACT SIP and evaluated one CTG issued in 2016 for applicability, as discussed herein, and has determined that they do not apply to sources located in the nonattainment area. This document presents "negative declarations" for those CTGs and provides supporting evidence for the NSAQMD's determinations. It also includes a commitment to implement RACT in the event that a source to which a CTG applies is identified in the nonattainment area in the future. Negative declarations and updated RACT analyses constitute revisions to a nonattainment area's State Implementation Plan (SIP), and must be approved by the governing body of the agency with jurisdiction over stationary sources of air pollution in the nonattainment area following public notice and a public hearing, pursuant to Section 110(a) of the federal Clean Air Act.

The NSAQMD has also determined that existing RACT rules are adequate for meeting RACT under the 2008 Ozone NAAQS, and that there are no major sources (that emit or have the potential to emit 50 tons or more per year) of ozone precursors located in the nonattainment area. The NSAQMD is therefore also adopting negative declarations that it has no major $NO_x$ or VOC sources in the ozone nonattainment area.

## 1.0 INTRODUCTION

The Northern Sierra Air Quality Management District includes the California counties of Plumas, Sierra and Nevada. Western Nevada County (population approximately 78,000) is predominantly rural, with two small cities (Grass Valley, population approximately 13,000; and Nevada City, population approximately 3,200).

Western Nevada County was designated in 2004 by EPA as a nonattainment area for the national 1997 8-hour Ozone NAAQS of .080 parts per million (ppm), pursuant to the federal Clean Air Act (CAA), and in December 2012 received a Clean Data Finding (77 FR 71552) for data meeting that standard. Also in 2012, the area was designated and classified Marginal Nonattainment for the 2008 8-hour ozone NAAQS of 0.075 ppm. Effective June 2016, Western Nevada County was bumped up to a Moderate Nonattainment area for the 2008 standard, and will soon bump up again to Serious. This submission addresses requirements for the 2008 Ozone NAAQS.

The nonattainment area ranges from low elevation rolling foothills in the west to mountains rising above 9,000 feet in the east, and is mostly forested. Most of western Nevada County's ozone comes from the Sacramento nonattainment area. There are no major sources in the nonattainment area. The largest stationary source of

ozone precursors in the Western Nevada County ozone nonattainment area is currently a gas station that emits under 2 tons of precursors per year.[1]

The CAA requires certain categories of sources (specified in Section 182(b)(2) and (f)) in ozone nonattainment areas to implement rules meeting RACT requirements for inclusion in California's SIP. RACT is defined as the lowest emission limitation that a particular source is capable of meeting by the application of control technology (i.e., devices, systems, process modification, or other apparatus or techniques that reduce air pollution) that is reasonably available, considering technological and economic feasibility. The RACT requirement is meant to ensure that ozone nonattainment areas are taking reasonable steps to minimize emissions of ozone precursors, which are oxides of nitrogen (NOx) and volatile organic compounds (VOCs). In order to assist areas in identifying and implementing RACT, EPA issues CTGs for specific source categories. These are considered to be RACT, and each nonattainment area must implement measures laid out in a CTG, or the equivalent, if there are sources in the area to which that CTG applies. EPA's implementation rule for the 2008 8-hour ozone standard also states that all relevant information, including recent technical information and information received during the public comment period should be considered at the time states are developing their RACT SIPs. Failure to adopt rules fully satisfying RACT can result in federal sanctions including withholding of federal highway funds and increased emission offset requirements for establishing or expanding major stationary sources of emissions.

For the 1997 ozone standard, the NSAQMD adopted several RACT rules and otherwise implemented all of the measures EPA identified as RACT via issuance of CTGs through 2008 that apply to existing sources in the nonattainment area, and has submitted negative declarations for CTGs through 2008 that do not apply to sources in the area. No additional CTGs were issued from 2009 through 2015. For the 2008 ozone standard, NSAQMD reviewed its permit files, performed an internet search, and consulted with knowledgeable NSAQMD personnel, and concluded that negative declarations that the District adopted for the 1997 ozone standard continue to be valid and applicable. Our review also concluded that negative declarations should also be adopted for two additional 1977 CTGs (bulk gasoline plants and storage of petroleum products in fixed roof tanks) because NSAQMD either has no sources in the ozone nonattainment area that are subject to these CTGs or the sources are below the CTGs' applicability threshold. The NSAQMD's review also concluded that there are no sources in the nonattainment area that are subject to the 2016 CTG titled *Control Techniques Guidelines for the Oil and Natural Gas Industry.*

## 2.0 APPLICABILITY ANALYSIS: CTG FOR THE OIL AND NATURAL GAS INDUSTRY

All of the nonattainment area's piped natural gas is supplied by the Pacific Gas and Electric Company (PG&E). There are no natural gas processing plants or well sites in the nonattainment area. Also, there are no oil wells or pipelines in the nonattainment area, and no place where rail tank cars are loaded or unloaded, and no ports.

The CTG (Control Techniques Guidelines for the Oil and Natural Gas Industry, EPA-453/B-16-001, October 2016) states on page 3-5, "This CTG covers select sources of VOC emissions in the onshore production and processing segments of the oil and natural gas industry (i.e., pneumatic controllers, pneumatic pumps, compressors, equipment leaks, fugitive emissions) and storage vessel VOC emissions in all segments (except distribution) of the oil and natural gas industry." There are no oil or natural gas production or processing facilities in the western Nevada County ozone nonattainment area. There also are no pre-distribution processes involving storage tanks or vessels in the area. All oil and natural gas industry activity in the nonattainment area

[1] CARB's emissions inventory lists Collins Pine Co., in Chester, CA and Sierra Pacific Industries in Quincy, CA with over 100 tons per year of $NO_x$. These facilities are located within the NSAQMD, but outside the Western Nevada County ozone nonattainment area.

is part of the distribution process. This information was verified through October 2017 e-mail correspondence with PG&E that included PG&E employees Rick Stewart, Ted Robinson (Senior Environmental Field Specialist), Rhonda Shiffman and Gary Ma. Thus, the CTG does not apply and the NSAQMD is proposing to adopt a negative declaration.

## 3.0 APPLICABILITY ANALYSIS: CTG FOR THE CONTROL OF VOLATILE ORGANIC EMISSIONS FROM BULK GASOLINE PLANTS

The CTG (Control of Volatile Organic Emissions from Bulk Gasoline Plants, EPA-450/2-77-035, December 1977) was addressed in the negative declarations submitted to EPA 2/7/08 by stating that rules 219 and 220 were determined by CARB to meet RACT, but the negative declaration appears to never have been either approved or disapproved by EPA. This is probably because rules 219 and 220 are not in the SIP. Nonetheless, the NSAQMD reviewed its records and learned that the throughput reported by the only source of this type in the nonattainment area is below the CTG's applicability cutoff of 4,000 gallons per day[2]. Thus, the CTG does not apply and the NSAQMD is proposing to adopt a negative declaration.

## 4.0 APPLICABILITY ANALYSIS: CTG FOR THE CONTROL OF VOLATILE ORGANIC EMISSIONS FROM STORAGE OF PETROLEUM LIQUIDS IN FIXED ROOF TANKS

In preparation for this submittal, the NSAQMD reviewed EPA-450/2077-036 Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed-Roof Tanks, December 1977[3] stationary source permits and records for non-permitted sources that have any relation to the petroleum product market and determined that there are no fixed roof petroleum liquid (having a true vapor pressure >10.5 kPa) storage tanks exceeding 40,000 gallons (the CTG applicability cut-off volume is 150,000 liters, which equals 39,625.8 gallons, so 40,000 gallons is the volume commonly used in rulemaking and applicability analyses. The NSAQMD believes it is aware of all petroleum handling facilities in its jurisdiction. Thus, the CTG does not apply and the NSAQMD is proposing to adopt a negative declaration.

## 5.0 NARRATIVES FOR PREVIOUSLY ADOPTED RACT RULES DETERMINED TO MEET CURRENT RACT REQUIREMENTS

**5.1 Rule 214 (Phase 1 Vapor Recovery)** was amended on 4/25/2011 and approved into the SIP on 1/7/2013 (78 FR 898) as meeting RACT, and the District is not aware of other reasonably available technology capable of reducing emissions from this source category. Based on the NSAQMD's research, the requirements are comparable to most other nonattainment areas, differing mainly in details rather than key limits and exemptions. For example, Placer County, as part of the Sacramento Severe Nonattainment Area, has a similar rule (Rule 213, amended 2/21/13) but does not include the pump-out of storage tanks into mobile fuelers – only transfer into storage tanks. Ventura County APCD's similar Phase 1 rule (Rule 70, amended April 2009) also does not apply to gasoline transfer into mobile fuelers, whereas NSAQMD's rule does.

**5.2 Rule 215 (Phase 2 Vapor Recovery)** was last amended 2/22/10 and approved into the SIP for the 1997 standard 7/26/11 (76 FR 44493). This 14-page rule contains many specific requirements and is difficult to compare with similar rules from other areas, which often combine requirements for Phase 1, Phase 2 and bulk gasoline facilities into a single rule. Using Ventura County APCD again for comparison, Ventura's similar rule (Rule 70, amended April 2009, which covers both Phase 1 and Phase 2 gasoline vapor recovery) was last amended earlier than NSAQMD's. They both require 95% control efficiency and defect-free, CARB-certified

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[2] See EPA – NSAQMD phone call notes dated June 26, 2015 indicating 2014 throughput was 803,500 gallons (~2200 gallons/day), which is below the CTG's applicability threshold of 15,000 liters (4,000 gallons) averaged daily on a 30-day rolling average.
[3] The CTG is available at https://www3.epa.gov/airquality/ctg_act/197712_voc_epa450_2-77-036_fixed_roof_tanks.pdf

components. Ventura's rule exempts privately owned storage containers fueling a fleet with 95% ORVR-equipped vehicles, whereas NSAQMD's rule only exempts non-retail facilities fueling a fleet with 100% ORVR-equipped vehicles, making NSAQMD's rule more stringent in this respect.

**5.3 Rule 227 (Cutback Asphalt)** was approved into the SIP for the 1997 standard 10/30/09. The NSAQMD compared its rule with Ventura's Serious classification Cutback Asphalt rule (74.4, amended July 1983) and found that Ventura's is less stringent. Ventura's has an exemption for penetrating prime coat applications and doesn't include recordkeeping requirements. In addition, the rule that the NSAQMD modeled its rule after is still considered RACT for the Sacramento Severe Nonattainment Area. The District is not aware of other reasonably available technological or operational controls likely to significantly reduce emissions from this source category for the 2008 ozone standard.

**5.4 Rule 228 (Miscellaneous Metal and Plastic Parts Coating)** was amended 4/25/11 and approved into the SIP for the 1997 standard 8/9/12. EPA has not taken action on the NSAQMD's September 27, 2011 negative declaration submittal for the plastic parts and heavier duty vehicle coatings portions of the CTG. Specifically, the District has no facilities that perform coating operations covered under the Miscellaneous Metal and Plastic Parts CTG (EPA-453/R-08-003) Table 3 Plastic Parts and Products, Table 4 Automotive / Transportation and Business Machine Plastic Parts, or Table 6 Motor Vehicle Materials that equal or exceed the CTG's applicability threshold of 15 lbs./day actual emissions, or an equivalent level of 2.7 tons per 12-month rolling period, before consideration of controls. In addition, the District has no sources subject to this CTG under Table 5 Pleasure Craft Surface Coating operations. The NSAQMD still has no sources subject to the Tables 3 – 6 categories of the CTG for the 2008 NAAQS. For the metal parts coating portions, the only source in the nonattainment area that was originally subject (Serra Corporation on Bitney Springs Road) has closed. Nonetheless, the NSAQMD would like to keep the rule in the SIP for the 2008 standard in case a new source opens, as it is a fairly common source type in general.

## 6.0 NEGATIVE DECLARATIONS & RACT RULE ADEQUACY -- STATEMENT OF ADOPTION

By adoption of this document, the Northern Sierra Air Quality Management District Board of Directors declares that, to the best of its knowledge and following a publicly noticed public hearing, there are no existing or anticipated sources in the Western Nevada County federal ozone Nonattainment Area to which the *Control Techniques Guidelines for the Oil and Natural Gas Industry* (EPA-453/B-16-001 2016/10); *Control of Volatile Organic Emissions from Bulk Gasoline Plants* (EPA-450/2-77-035 1977/12) or *Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed-Roof Tanks* (EPA-450/2-77-036 1977/12) apply.

By adoption of this document, the Northern Sierra Air Quality Management District Board of Directors further declares that, to the best of its knowledge and following a publicly noticed public hearing, existing Rules 214, 215, 227 and 228 meet RACT requirements for the 2008 Ozone NAAQS.

By adoption of this document, the Northern Sierra Air Quality Management District Board of Directors further declares that, to the best of its knowledge and following a publicly noticed public hearing, that the District has no sources in the Western Nevada County Ozone Nonattainment Area subject to the CTGs listed as negative declarations in the following table. The District further declares that all negative declarations listed are current, adequate and applicable for the 2008 Ozone NAAQS.

By adoption of this document, the Northern Sierra Air Quality Management District Board of Directors further declares that RACT will be implemented, consistent with legal requirements, for any new or discovered sources in the Western Nevada County Ozone Nonattainment Area which are determined to be subject to any of the

CTGs for which negative declarations are now being or have been adopted, or to which any other RACT requirement applies.

By adoption of this document, the Northern Sierra Air Quality Management District Board of Directors further declares that, to the best of its knowledge and following a publicly noticed public hearing, there are no existing or anticipated stationary major sources (sources that emit or have the potential to emit 50 tons or more per year) of NOx or VOCs in the Western Nevada County Ozone Nonattainment Area.

**Summary Table of All CTGs, Indicating NSAQMD's RACT Actions and Negative Declarations Hereby Determined to be Current, Adequate and Applicable for the 2008 NAAQS**

| CTG Titles and References | Determinations and Actions |
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| 1. Design Criteria for Stage I Vapor Control Systems - Gasoline Service Stations, November 1975. [EPA never assigned a document number to this CTG.] | These criteria are incorporated into State regulations for Stage 1 vapor recovery. The District revised Rule 214 (approved by EPA at 78 FR 897, 1/7/13) to specify associated RACT requirements. |
| 2. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume I: Control Methods for Surface Coating Operations, EPA-450/2-76-028, November 1976. [This document is a compilation of control techniques.] | This does not define RACT for a specific source category, so it was not implemented as RACT. Individual District operating permits specify control techniques for sources in this category. |
| 3. 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, May 1977. | There are no existing or anticipated sources in these categories in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544. The District continues to have no sources subject to this CTG. *Negative Declaration for 2008 NAAQS* |
| 4. Control of Volatile Organic Emissions from Solvent Metal Cleaning, EPA-450/2-77-022, November 1977. | The only source type in the nonattainment area that is covered by this CTG is cold cleaners. These are exempt from RACT in the nonattainment area because it is rural (pop. <200,000), pursuant to the EPA memo, "Clarification of Degreasing Regulation Requirements" (September 7, 1978).[4] A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544. *Negative Declaration for 2008 NAAQS* |
| 5. Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds, EPA-450/2-77-025, October 1977. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544. *Negative Declaration for 2008 NAAQS* |
| 6. Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals, EPA-450/2-77-026, December 1977. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544. *Negative Declaration for 2008 NAAQS* |

[4] The September 7, 1978 memo is available at https://www3.epa.gov/ttn/naaqs/aqmguide/collection/Doc_0027_VOC150907781.pdf

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| 7. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume III: Surface Coating of Metal Furniture, EPA-450/2-77-032, December 1977. | There are no existing or anticipated sources in this category that exceed de minimis levels (actual emissions of 15 lbs./day) in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 8. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume IV: Surface Coating for Insulation of Magnet Wire, EPA-450/2-77-033, December 1977. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 9. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume V: Surface Coating of Large Appliances, EPA-450/2-77-034, December 1977. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 10. Control of Volatile Organic Emissions from Bulk Gasoline Plants, EPA-450/2-77-035, December 1977. | There are no existing or anticipated sources in this category that exceed de minimis levels (4,000 gallons per day throughput on a 30-day rolling average)[5] in the nonattainment area. This CTG was addressed in the NSAQMD's 2/7/08 RACT submittal by stating that NSAQMD's Rules 219 and 220 collectively met RACT requirements, but those rules are not in the SIP and EPA has not taken action on that portion of the 2/7/08 submittal. However, since there are no sources in the area with throughput great enough to trigger CTG applicability anyway, the CTG is being addressed here on that basis as a negative declaration.<br>*Negative Declaration for 2008 NAAQS* |
| 11. Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed Roof Tanks, EPA-450/2-77-036, December 1977. | There are no existing or anticipated sources in this category in the nonattainment area, so a negative declaration is included in this submittal.<br>*Negative Declaration for 2008 NAAQS* |
| 12. Control of Volatile Organic Compounds from Use of Cutback Asphalt, EPA-450/2-77-037, December 1977. | The District adopted Rule 227 (approved by EPA at 74 FR 56120, 10/30/09) to implement RACT for this source category. |

[5] See Model VOC rules for RACT, June 1992, page 122, available at https://archive.epa.gov/ttn/ozone/web/pdf/voc_modelrules.pdf

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| 13. Control Techniques for Volatile Organic Emissions from Stationary Sources, EPA-450/2-78-022, May 1978. | This does not define RACT for a specific source category, so it was not implemented as RACT. Individual District operating permits specify control techniques for sources in this category. |
| 14. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VI: Surface Coating of Miscellaneous Metal Parts and Products, EPA-450/2-78-015, June 1978. | The District adopted Rule 228 (approved by EPA at 77 FR 47536, 10/9/12) to implement RACT for this source category. |
| 15. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VII: Factory Surface Coating of Flat Wood Paneling, EPA-450/2-78-032, June 1978. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544. The District continues to have no sources subject to this CTG. *Negative Declaration for 2008 NAAQS* |
| 16. Control of Volatile Organic Compound Leaks from Petroleum Refinery Equipment, EPA-450/2-78-036, June 1978. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544. *Negative Declaration for 2008 NAAQS* |
| 17. Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products, 450/2-78-029, December 1978. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544. *Negative Declaration for 2008 NAAQS* |
| 18. Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires, EPA-450/2-78-030, December 1978. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544. *Negative Declaration for 2008 NAAQS* |
| 19. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VIII: Graphic Arts - Rotogravure and Flexography, EPA-450/2-78-033, December 1978. | There are no existing or anticipated sources in these categories that exceed 100 tpy[6] de minimis levels in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544. The District continues to have no sources subject to this CTG. *Negative Declaration for 2008 NAAQS* |

[6] See Table 2 in EPA's VOC Blue Book, May 25, 1988, available at https://archive.epa.gov/ttn/ozone/web/pdf/voc_bluebook.pdf

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| 20. Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks, EPA-450/2-78-047, December 1978. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 21. Control of Volatile Organic Emissions from Perchloroethylene Dry Cleaning Systems, EPA-450/2-78-050, December 1978. | No longer a required RACT analysis category, since PERC has been exempted as a VOC. |
| 22. Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems, EPA-450/2-78-051, December 1978. | The District revised Rule 214 (approved by EPA at 78 FR 897, 3/8/13) to implement RACT for this source category. Approved by EPA at 77 FR 47536, 10/9/12. |
| 23. Fugitive Emission Sources of Organic Compounds – Additional Information on Emissions, Emission Reductions, and Costs, EPA-450/3-82-010, April 1982. | This does not define RACT for a specific source category, so it was not implemented as RACT. It is included on EPA's published CTG list, so it is being included in this list for public information, even though it is not technically a real CTG. |
| 24. Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009, September 1982. | There are no existing or anticipated sources in this category that exceed de minimis levels (32,500 gallons/year) in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 25. Control of Volatile Organic Compound Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins, EPA-450/3-83-008, November 1983. | There are no existing or anticipated sources in these categories in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 26. Control of Volatile Organic Compound Equipment Leaks from Natural Gas/Gasoline Processing Plants, EPA-450/2-83-007, December 1983. | There are no existing or anticipated sources in these categories in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 27. Control of Volatile Organic Compound Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment, EPA-450/3-83-006, March 1984. | There are no existing or anticipated sources in these categories in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |

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| 28. Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry, EPA-450/3-84-015, December 1984. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 29. Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry, EPA 450/4-91-031, August 1993. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 30. Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations, EPA-453/R-96-007, April 1996. | There are no existing or anticipated sources in this category that exceed de minimis levels (potential to emit 25 tons per year of VOCs) in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 31. Control Techniques Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating), EPA 453/R-94-032, August 1996. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 32. Aerospace (CTG & MACT), EPA-453/R-97-004, December 1997. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544.<br>*Negative Declaration for 2008 NAAQS* |
| 33. Control Techniques Guidelines for Industrial Cleaning Solvents, EPA-453/R-06-001, September 2006. | There are no existing or anticipated sources in this category that exceed 15 lbs./day actual emissions[7] de minimis levels in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130.<br>*Negative Declaration for 2008 NAAQS* |

[7] See page 5 of the CTG. available at https://www3.epa.gov/airquality/ctg_act/200609_voc_epa453_r-06-001_ind_cleaning_solvents.pdf

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| 34. Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006. | There are no existing or anticipated sources in this category that exceed de minimis levels (actual emissions of 15 lbs./day or 3 tons per 12-month period) in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130. *Negative Declaration for 2008 NAAQS* |
| 35. Control Techniques Guidelines for Flexible Package Printing, EPA-453/R-06-003, September 2006. | There are no existing or anticipated sources in this category that exceed de minimis levels (actual emissions of 15 lbs./day or 3 tons per 12-month period) in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130. *Negative Declaration for 2008 NAAQS* |
| 36. Control Techniques Guidelines for Flat Wood Paneling Coatings, EPA-453/R-06-004, September 2006. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130. *Negative Declaration for 2008 NAAQS* |
| 37. Control Techniques Guidelines for Paper, Film, and Foil Coatings, EPA 453/R-07-003, September 2007. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130. *Negative Declaration for 2008 NAAQS* |
| 38. Control Techniques Guidelines for Large Appliance Coatings, EPA 453/R-07-004, September 2007. | There are no existing or anticipated sources in this category in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130. *Negative Declaration for 2008 NAAQS* |
| 39. Control Techniques Guidelines for Metal Furniture Coatings, EPA 453/R-07-005, September 2007. | There are no existing or anticipated sources in this category that exceed 15 lb/day[8] actual emissions de minimis levels in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130. *Negative Declaration for 2008 NAAQS* |

[8] See page 3 of the CTG, available at https://www3.epa.gov/airquality/ctg_act/200709_voc_epa453_r-07-005_metal_furniture_coating.pdf

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| 40. Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings, EPA 453/R-08-003, September 2008. | The District adopted Rule 228 (approved by EPA at 77 FR 47536, 10/9/2012) to implement RACT for this source category. The District also adopted a Negative declaration for plastic parts coatings and heavier duty vehicle coatings on 2/22/10 (received by EPA 7/20/10), which EPA has not yet taken action on, for portions of the CTG that don't apply in the nonattainment area. The District is also adopting a negative declaration for pleasure craft coatings. In summary, negative declarations are claimed for sources covered under Tables 3-6 of the CTG. |
| 41. Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials, EPA 453/R-08-004, September 2008. | There are no existing or anticipated sources in this category that exceed de minimis levels (actual emissions of 15 lbs./day or 2.7 tons per 12-month period) in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130. *Negative Declaration for 2008 NAAQS* |
| 42. Control Techniques Guidelines for Miscellaneous Industrial Adhesives, EPA 453/R-08-005, September 2008. | There are no existing or anticipated sources in this category that exceed de minimis levels (actual emissions of 15 lbs./day or 3 tons per 12-month period) in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130. *Negative Declaration for 2008 NAAQS* |
| 43. Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings, EPA 453/R-08-006 (and Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Primer-Surfacer and Topcoat Operations, EPA 453/R-08-002), September 2008. | There are no existing or anticipated sources in this category that exceed de minimis levels (actual emissions of 15 lbs./day) in the nonattainment area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130. *Negative Declaration for 2008 NAAQS* |
| 44. Control Techniques Guidelines for the Oil and Natural Gas Industry, EPA 453/B-16-001, October 2016. | There are no existing or anticipated sources in this category in the nonattainment area (see Section 2.0 of this document). *Negative Declaration for 2008 NAAQS* |
| Major stationary sources of VOC | There are no existing or anticipated major sources of VOC in the nonattainment area. *Negative Declaration for 2008 NAAQS* |
| Major stationary sources of $NO_x$ | There are no existing or anticipated major sources of $NO_x$ in the nonattainment area. *Negative Declaration for 2008 NAAQS* |