

**EL DORADO COUNTY
AIR QUALITY MANAGEMENT DISTRICT**

**REASONABLY AVAILABLE CONTROL
TECHNOLOGY (RACT) STATE
IMPLEMENTATION PLAN (SIP) UPDATE
ANALYSIS STAFF REPORT**

2008 Ozone Implementation Rule

January 3, 2017

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INTRODUCTION

El Dorado County is located in northern California, bordering Sacramento County on the west and the State of Nevada on the east. Air quality attainment planning is under the jurisdiction of the El Dorado County Air Quality Management District (District). Elevations range from 1,000 feet in the western portion of the County to 9,000 feet in the mountains of the Sierra. El Dorado County is divided into two different air basins: the Mountain Counties Air Basin (MCAB); and the Lake Tahoe Air Basin (LTAB). Each air basin has its own meteorological and geographic conditions. Generally, the Mediterranean climate in the adjacent Sacramento Valley Air Basin (SVAB) and the lower elevations of the MCAB have summers that are hot and dry with temperatures usually in the 90s, which are conducive to ozone formation. Prevailing winds from the west transport ozone from the San Francisco Bay Area and the Sacramento Valley into the foothill and mountain areas.

The portions of El Dorado County in the MCAB are included in the Sacramento Federal Ozone Non-Attainment Area (SFNA), which was designated as “serious” non-attainment for the 1997 8-hour ozone National Ambient Air Quality Standard (NAAQS). Since the Sacramento region needs to rely on the longer term emission reduction strategies from state and federal mobile source control programs, the 2013 attainment date could not be met. Consequently, on February 14, 2008, the California Air Resources Board (CARB), on behalf of the air districts in the Sacramento region, submitted a letter to EPA requesting a voluntary reclassification (bump-up) of the SFNA from a “serious” to a “severe” 8-hour ozone nonattainment area with an extended attainment deadline of June 15, 2019, and additional mandatory requirements. On May 5, 2010 EPA approved the request effective June 4, 2010 (75 Fed. Reg. 24409). Before the U.S. Environmental Protection Agency (U.S. EPA) posted new 8-hour ozone designations and non-attainment classifications in June 2004, the SFNA was a “severe” non-attainment area for the 1-hour ozone NAAQS. Although the U.S. EPA revoked the 1-hour ozone NAAQS, the SFNA still remains subject to control measure commitments that applied under the 1-hour ozone NAAQS. Therefore, the District is responsible for implementing emission standards and other requirements mandated by the Federal Clean Air Act.

REASON FOR THIS ANALYSIS

Sections 182(b)(2) and 182(f) of the Federal Clean Air Act require ozone non-attainment areas to implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guideline (CTG) documents issued by U.S. EPA and for “Major Sources” of Volatile Organic Compounds (VOCs) and Oxides of Nitrogen (NO_x), which are ozone precursors. RACT requirements are included in the Clean Air Act to assure that significant source categories at major sources are controlled to a “reasonable” extent, but not necessarily to Best Available Control Technology (BACT) which are expected of new sources or Maximum Achievable Control Technology (MACT) levels.

U.S. EPA defines RACT as the lowest emission limitation that a particular source is capable of meeting by the application of 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.

According to the U.S. EPA's *Final Rule for Implementation of the 2008 National Ambient Air Quality Standards for Ozone* (80 Fed. Reg. 12263 (March 6, 2015)) areas classified as moderate non-attainment or higher must submit a demonstration that their current rules fulfill 2008 8-hour ozone RACT for all CTG categories and all Major, non-CTG Sources as a revision to their State Implementation Plan (SIP). States can demonstrate that RACT is being met with either a new RACT determination or a certification that previously required RACT controls continue to represent RACT for 8-hour ozone. Areas may rely on previous RACT analyses written for 1-hour ozone plans, 1997 ozone NAAQS, and/or U.S. EPA guidance documents. The

RACT SIP submittal is in addition to the area's 8-hour Ozone Attainment Demonstration Plan for the 1997 standard, which was submitted to EPA on December 31, 2013.

District Planning History

To improve the air quality in El Dorado County and move the region towards attainment of the NAAQS, the District has prepared and adopted several air quality attainment plans since 1991. The following table summarizes the District's attainment plans. The District has also adopted over 100 new rules and amendments to meet the commitments in these attainment plans. The air quality in El Dorado County has improved over the past several years as the District has adopted air quality plans and regulations. In a continuation of the District's strategy for achieving the NAAQS, the District is working with other air districts in the SFNA to submit an 8-hour ozone attainment demonstration plan to U.S. EPA for the 2015 8-hour ozone standard (0.070 ppm) as specified by federal requirements.

2006 RACT-SIP ANALYSIS

On March 9, 2006 and April 4, 2006, Andrew Steckel, U.S. EPA Office Rulemaking Chief, sent request letters to the California Air Resources Board (CARB). The letters concern District requirements and outlined a possible RACT SIP submittal strategy to determine whether RACT requirements have been met.

The District was requested to prepare a complete RACT SIP update analysis, covering major sources of VOC and NOx and sources covered by CTG documents. In addition, the District was required to implement an 8-hour Ozone Demonstration Plan no later than the beginning of the first ozone season or portion thereof that occurs 30 months after the above submittal date. This was March 15, 2009. Since El Dorado County has a full year ozone season, the required implementation date for the District was January 1, 2009. Note that the implementation date for any source operating under a Title V permit, pursuant to 40 C.F.R. Part 70, would be governed by the requirements of that permit.

The District adopted the 2006 RACT SIP on February 6, 2007 and the analysis was submitted to EPA on July 11, 2007. EPA's review of the 2006 RACT SIP identified three potential source categories for which the District should consider for negative declarations. After consultation with EPA, the District submitted three Negative Declarations which included:

- a. Miscellaneous Metal Parts and Products CTG (EPA 450/2-78-015)
- b. Solvent Metal Cleaning CTG (EPA 450/2-77-022)
- c. Graphic Arts - Rotogravure and Flexography CTG (EPA 450/2-78-033).

EPA issued a Direct Final Rule on January 14, 2014 (79 Fed. Reg. 2375) approving these three Negative Declarations with an effective date of March 17, 2014. As detailed below, these three negative declarations are still relevant. EPA issued a Final Rule approving the District's 2006 RACT analysis into the SIP on April 18, 2014 (79 Fed. Reg. 21849) with an effective date of May 19, 2014.

2008 RACT-SIP ANALYSIS

Background

RACT requires that all non-attainment areas classified as "moderate" or above have RACT in place for source categories covered by a CTG document and for major sources that are not subject to a CTG (i.e. a "major non-CTG source"). A "major source" of VOC or NOx in the

“severe” non-attainment area of El Dorado County is defined as an emission source that emits or has the potential to emit at least 25 tons of the pollutant per year. The District must adopt the control measures for a source category if it has a source of emissions located within the non-attainment area that is subject to a CTG. Alternatively, if the finding is made that there are no existing sources that emit the designated pollutants in its area subject to a RACT requirement, the District may make a negative declaration to this effect and consequently the requirement to adopt a rule for those sources is not applicable. This process is called “Negative Declaration.”

The District may elect to submit Negative Declarations for all CTG categories for which there are no sources above the CTG recommended threshold. Negative declarations must be made for previous CTGs even if such negative declarations were made for an earlier SIP. This is necessary since there may be sources in the non-attainment area that previously did not exist. Also, if the boundaries of the non-attainment area have expanded, there may be sources in the new portion of the non-attainment area which should not be overlooked.

The District must also submit a Negative Declaration to certify that there are no Major non-CTG Sources in the non-attainment area. Negative Declarations must go through the same public review requirements as any other SIP submittal.

The Mountain Counties Air Basin portion of the District is the only part subject to RACT, and, while the Tahoe area in the Lake Tahoe Air Basin is in attainment of the federal ozone standard, it is designated non-attainment transitional for the state 8-hour ozone standard, which is also 70ppb. Therefore, Tahoe area sources have been included in the analysis below.

District activities performed as a part of this analysis are as follows:

Step 1 Identify all U.S. EPA Control Techniques Guidelines (CTG) categories for which there are no facilities in the District (Table A).

Step 2 Identify all CTG categories for which there are sources but those sources are below CTG cutpoints (Table B) and identify all Negative Declarations to be adopted (Table C).

Step 3 Identify all SIP-approved District rules, determine if there are major sources of emissions or non-major sources that are still subject to the applicable CTG, and determine if the rule meets RACT standards. (Table D)

Step 4 Identify District actions required based on the RACT analysis.

Major Sources:

The District currently has no “major” sources of air pollution as defined for areas designated “severe” non-attainment per the CAA. These are sources which emit more than 25 tons per year of VOC or NOx. This was determined from a review of the District emissions inventory, permit database, internet research, consultation with District Air Quality Specialists (field inspectors), and personal knowledge.

During the 2006 RACT-SIP update, the District had one major source and Title V facility: Sierra Pacific Industries (SPI) in Camino. SPI operated a Biomass Boiler and was regulated under SIP-approved District Rules 232 Biomass Boilers (Federal Register Publication Date 10/14/2003) and Rule 234 VOC RACT Rule – Sierra Pacific Industries (Fed. Reg. Publication Date 9/12/1995). SPI ceased operation of the Biomass Boiler in 2009 and dismantled the unit in 2013. There is no longer an active District permit for this boiler.

Step 1: Identify all U.S. EPA Control Techniques Guidelines (CTG) categories for which there are no facilities in the District.

The District staff reviewed permit databases, SIC codes, internet searches, other source data, and the emission inventory for its Federal Clean Air Plan, consulted with District Air Quality Specialists (field inspectors), and determined that there are no sources for the CTG categories listed below in Table A.

Table A: CTG Categories with No Sources in El Dorado County				
	CTG Category	CTG	CTG Date	Reason
1	Aerospace Coating	EPA-453/R-97-004	Dec 1997	No Sources
2	Auto and Light-Duty Truck Assembly Coating	EPA-453/R-08-006 Part of EPA-450/2-77-008	Sep 2008	No Sources
3	Bulk Loading Terminals	EPA-450/2-77-026	Oct 1977	No Sources
4	Fiberglass Boat Manufacturing	EPA-453/R-08-004	Sep 2008	No Sources
5	Large Appliance Coating	EPA-453/R-07-004 EPA-450/2-77-034	Sep 2007 Dec 1977	No Sources
6	Magnet Wire Coating	EPA-450/2-77-033	Dec 1977	No Sources
7	Cans, Coils, Paper and Fabric Coatings	Part of EPA-450/2-77-008	May 1977	No Sources
8	Metal Furniture Coating	EPA-453/R-07-005 EPA-450/2-77-032	Sep 2007 Dec 1977	No Sources
9	Flat Wood Paneling Coating	EPA-453/R-06-004 EPA-450/2-78-032	Sep 2006 June 1978	No Sources
10	Natural Gas/Gasoline Processing Plants	EPA-450/3-83-007	Dec 1983	No Sources
11	Paper, Film and Foil Coating	EPA-453/R-07-003	Sep 2007	No Sources
12	Petroleum Refineries	EPA-450/2-77-025 EPA-450/2-78-036	Oct 1977 June 1978	No Sources
13	Pharmaceutical Products	EPA-450/2-78-029	Dec 1978	No Sources
14	Polystyrene/Polyethylene/Polypropylene Resins Manufacturing	EPA-450/3-83-008 EPA-450/3-83-006	Nov 1983 Mar 1984	No Sources
15	Rubber Tires	EPA-450/2-78-030	Dec 1978	No Sources
16	Ship Coating	61 FR 44050 (EPA-453/R-94-032)	Aug 1996 Apr 1994	No Sources
17	Synthetic Organic Chemical Manufacturing	EPA-450/3-84-015 EPA-450/4-91-031	Dec 1984 Aug 1993	No Sources
18	Oil & Natural Gas Industry	EPA-453-B/16-001	Oct 2016	No Sources

Since there are no existing sources in these CTG categories, the District recommends that Negative Declarations be submitted to U.S. EPA for approval. Staff will submit these Negative Declarations for public comment and District Board consideration and approval. If approved by the Board, the Negative Declarations will be submitted to CARB for forwarding to U.S. EPA as requested revisions to the State Implementation Plan.

Step 2: Identify all CTG categories for which there are sources but those sources are below CTG cutpoints and identify all Negative Declarations to be adopted.

The District Staff reviewed permit databases, SIC codes, other source data, and the emission inventory for its Federal Clean Air Plan, consulted with District Air Quality Specialists (field inspectors), and determined that there *may* be sources for the CTG categories listed below in Table B, but that those sources are below the CTG cut points for that respective category:

Table B: CTG Categories with Sources Below CTG Cutpoints				
	CTG Category	CTG	CTG Date	Reason
19	Adhesives	EPA-453/R-08-005	Sep 2008	Sources below CTG cut points
20	Graphic Arts	EPA-453/R-06-002 EPA-453/R-06-003 EPA-450/2-78-033	Sep 2006 Sep 2006 Dec 1978	Sources below CTG cut points
21	Metal & Plastic Parts Coatings	EPA-453/R-08-003 EPA-450/2-78-015	Sep 2008 June 1978	Sources below CTG cut points
22	Petroleum Dry Cleaning	EPA-450/3-82-009	Sep 1982	Sources below CTG cut points
23	Solvent Cleaning	EPA-453/R-06-001 EPA-450/2-77-022	Sep 2006 Nov 1977	Sources below CTG cut points
24	Tanks (Fixed and Floating Roof)	EPA-450/2-77-036 EPA-450/2-78-047	Dec 1977 Dec 1978	Sources below CTG cut points
25	Wood Furniture Production	EPA-453/R-96-007	Apr 1996	Sources below CTG cut points

Adhesives:

The 2008 CTG applies to each miscellaneous industrial adhesive application process at a facility where the total actual VOC emissions from all miscellaneous industrial adhesive application processes, including related cleaning activities, at that facility are equal to or exceed 6.8 kg/day (15 lb/day), or an equivalent level such as 3 tons per 12-month rolling period, before consideration of controls. There are no sources in El Dorado County permitted under Rule 236 Adhesives. This rule applies to facilities that use adhesives, adhesive primers, and adhesive bonding primers in excess of 10 gallons per year or one pint per day. Potential sources of adhesive emissions in El Dorado County include automotive body repair facilities, sign companies, and wood cabinet manufacturing or repair. None of these sources individually emit more than the 15 lb/day cutpoint for the CTG, therefore, there are no sources in El Dorado County subject to CTG EPA-453/R-08-005.

Graphic Arts:

The 2006 CTG for graphic arts and associated cleaning materials and fountain solutions applies to any offset lithographic printing operation where the emissions associated with all aspects of that operation equal or exceed 6.8 kg/day (15 lb/day) actual emissions of VOC. Additionally, the CTG applies to any letterpress printing operation where the emissions associated with all aspects of that operation equal or exceed 6.8 kg/day (15 lb/day) actual emissions of VOC. Finally, the latest flexible packaging printing operations CTG applies to sources emitting at least 6.8 kg/day (15 lb/day) actual emissions of VOC before consideration of controls.

The District reviewed the permit database and emissions inventory and consulted with district inspectors to determine if any graphic arts and printing industry in El Dorado County exceed 15 lbs/day VOC emissions. There is only one printing company under District permit: DST Output; a large, 24-hour, 7 days a week, printer of bills and invoices located in El Dorado Hills. DST has a facility-wide quarterly VOC permit limit for all printing operations. In the last six years, DST's greatest quarterly VOC emissions were only 74% of the permit limit (Q2, 2011). The VOC content of their inks has steadily decreased from a range of 0.8-0.5 lbs/gallon to 0.33-0.05 lbs/gallon in the past few years. Their average daily VOC emissions are as follows:

DST Output Average Daily Emissions (lbs/day)			
2012	2013	2014	2015
11.18	7.8	7.47	9.72

The next three largest printing companies in El Dorado County are Imperial Printing, Minuteman Press, and Placerville Press, all in Placerville. Imperial and Minuteman use primarily toners, but they use approximately one 5 lb can of black ink per month and one 2 lb can of colored ink. Placerville Press's Permit to Operate was cancelled in February 2016 as it was determined the facility emitted less than 2 lbs/day, which is below the permit exemption found in Rule 501 General Permitting. There are also two label printing companies: Grigsby Labels in El Dorado Hills and Perfecto Labels in Diamond Springs. Both do very low volume production and do not use solvent-based inks. All would have VOC emissions well below the CTG threshold of 15 lbs/day.

The two largest newspapers in El Dorado County are the *Mountain Democrat* and *Tahoe Tribune*. The *Mountain Democrat* and its various versions are printed in Solano County at Daily Republic printing. The *Tahoe Tribune* is printed at Sierra Nevada Media Group in Carson City, NV. The largest monthly news magazine is *Tahoe Mountain News* which is likewise printed at Sierra Nevada Media Group. The three largest weekly advertising publications: The Clipper, Goldpanner, and the Windfall, all use Gold Country Media printing in Auburn, CA in the adjacent air district in Placer County. There are no printing companies performing flexible package printing in El Dorado County. Therefore, there are no sources in El Dorado County subject to CTGs EPA-453/R-06-002 and EPA-453/R-06-003.

With respect to the 1978 CTG for rotogravure and flexography, according to Page 2-25 of "*Issues Relating to VOC Regulation cutpoints, Deficiencies, and Deviations: Clarification to Appendix D of November 24, 1987 Federal Register*"¹ published by the EPA on May 25, 1988, Graphic Arts operations sources which do not exceed 100 tons per year potential VOC emissions are exempt from the CTG. As shown above, the District has evaluated all potential sources of graphic arts operations and determined there are none with the potential to emit 100 tons VOC or more annually. The Negative Declaration previously adopted by the El Dorado County Air Board of Directors on December 11, 2012 and approved by the EPA is still valid; therefore, there are no sources in El Dorado County subject to CTG EPA-450/2-78-033.

Metal & Plastic Parts Coatings:

The 2008 CTG for this source category applies to facilities that coat metal and plastic parts with total actual VOC emissions from all miscellaneous metal product and plastic parts surface coating operations, including related cleaning activities, which equal or exceed 15 lbs/day or 2.7 tons/year.² The following facilities are under permit with AQMD and their potential (allowed) emissions and most recent actual emissions are provided:

¹ *Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations: Clarification to Appendix D of November 24, 1987 Federal Register*, May 25, 1988, Revised January 11, 1990, U.S. EPA, Air Quality Management Division, Office of Air Quality Planning and Standards ("The Blue Book")

² EPA 453/R-08-003 CTG for Miscellaneous Metal and Plastic Parts Coatings, pg 3.
https://www3.epa.gov/airquality/ctg_atc/200809_voc_epa453_r-08-003_misc_metal_plasticparts_coatings.pdf

Facility	Objects coated	Potential (Permitted) Emissions	Actual Emissions 2015
Aerometals	Helicopter parts	2 tons/yr	446 lbs/yr
El Dorado Disposal	Metal containers	2 tons/yr	232 lbs/yr
Rack-It Truck Racks	Pick-up truck racks	6.95 tons/yr	2,235 lbs/yr
SMUD – Riverton Maint	Metal containers	0.5 ton/yr	27 lbs/yr
Snowline Engineering	Metal cabinets	2,599 lbs/yr	349 lbs/yr
South Tahoe Refuse (Tahoe)	Metal containers	1 ton/yr	41 lbs/yr
Western Sign Co.	Metal & plastic signs	1.7 tons/yr	199 lbs/yr

None of these facilities exceed the 2008 CTG cut point of 2.7 tons per year actual emissions. Therefore, there are no sources in El Dorado County subject to CTG EPA-453/R-08-003.

With respect to the 1997 CTG, according to Page 2-16 of *“Issues Relating to VOC Regulation cutpoints, Deficiencies, and Deviations: Clarification to Appendix D of November 24, 1987 Federal Register”*³ published by the EPA on May 25, 1988, Miscellaneous Metal Parts sources which do not exceed 10 tons per year potential VOC emissions or 3 lbs VOC/hr or 15 lbs/day⁴ actual emissions before add-on controls are exempt from the CTG. As shown above, the District has evaluated all potential sources of metal parts coatings and determined there are none with the potential to emit 10 tons VOC or more annually. The Negative Declaration previously adopted by the El Dorado County Air Board of Directors on December 11, 2012 and approved by the EPA (79 Fed. Reg. 2375, January 14, 2014) is still valid; therefore, there are no sources in El Dorado County subject to CTG EPA-450-2-78-015.

Petroleum Dry Cleaning:

The 1982 CTG for this source category applies to large petroleum dry cleaning facilities consuming more than 32,500 gallons of solvent annually. The following facilities are under permit with AQMD and their potential (allowed) emissions and most recent actual emissions are provided:

Facility	Process	Potential (Permitted) Emissions	Actual Emissions
49er Cleaners	Hydrocarbon Dry to Dry	1,320 lbs/yr	128 lbs/yr
Cambridge Cleaners	Hydrocarbon Dry to Dry	400 lbs/yr	381 lbs/yr
Classic Cleaners	Hydrocarbon Dry to Dry	No Limit	68 lbs/yr
Green Valley Cleaners	Hydrocarbon Dry to Dry	No Limit	102 lbs/yr
Johns Cleaners (Tahoe)	Hydrocarbon Dry to Dry	1,536 lbs/yr	256 lbs/yr
Tahoe One Hour Cleaners (Tahoe)	Hydrocarbon Dry to Dry	196 lbs/yr	56 lbs/yr

All of these facilities use significantly less solvent than the CTG’s applicability threshold of 32,000 gallons/yr. Specifically, the individual facilities use less than 100 gallons of solvent per year. Therefore, there are no sources in El Dorado County subject to CTG EPA-450-3-82-009.

³ *Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations: Clarification to Appendix D of November 24, 1987 Federal Register*, May 25, 1988, Revised January 11, 1990, U.S. EPA, Air Quality Management Division, Office of Air Quality Planning and Standards (“The Blue Book”)

⁴ 15 lb/day is roughly equivalent to 2.7 tpy.

Solvent Cleaning:

The 2006 CTG applies to industries that use organic solvent for cleaning operations such as mixing vessels (tanks), spray booths, and parts cleaners, where a facility emits at least 6.8 kg/day (15 lb/day) of VOC before consideration of controls in an ozone nonattainment area. The cleaning activities for removal of foreign material from substrate being cleaned include actions (activities) such as wiping, flushing, or spraying.

The District reviewed the permit database and emissions inventory and consulted with district inspectors to determine if any industries using cleaning solvents in El Dorado County exceed 15 lbs/day VOC emissions. The following list contains all solvent-cleaning users with the latest actual VOC emissions data:

Facility	Industry & Process	Potential (Permitted) Emissions	Actual Emissions
Caliber Collision	Automotive Collision Repair – Surface Prep	9.7 lbs/day (Total VOC: paint and solvent)	None yet (construction complete Jan 2016)
California Colors (Tahoe)	Automotive Collision Repair – Surface Prep	31 lbs/day (Total VOC: paint and solvent)	0.57 lbs/day (Total VOC)
Cameron Park Auto Body	Automotive Collision Repair – Surface Prep	15 lbs/day (Total VOC: paint and solvent)	0.82 lbs/day (Total VOC)
Cooks Collision	Automotive Collision Repair – Surface Prep	26 lbs/day (Total VOC: paint and solvent)	1.91 lbs/day (Total VOC)
Doug Veerkamp General Engineering	Construction Company – Construction Equipment Repair – Surface Prep	173 lbs/day (Total VOC: paint & solvent)	0.13 lbs/day (solvent only)
Frank's Body Shop	Automotive Collision Repair – Surface Prep	82 lbs/day (Total VOC: paint and solvent)	1.62 lbs/day (Total VOC)
Fulmer's Auto Body	Automotive Collision Repair – Surface Prep	9.9 lbs/day (Total VOC: paint and solvent)	1.24 lbs/day (Total VOC)
G & O Body Shop	Automotive Collision Repair – Surface Prep	10 lbs/day (Total VOC: paint and solvent)	4.23 lbs/day (Total VOC)
Hangtown Body Shop	Automotive Collision Repair – Surface Prep	44.9 lbs/day (Total VOC: paint and solvent)	1.08 lbs/day (Total VOC)
Kniesel's Collision Center	Automotive Collision Repair – Surface Prep	15 lbs/day (Total VOC: paint and solvent)	1.82 lbs/day (Total VOC)
M & M Auto Body	Automotive Collision Repair – Surface Prep	4.91 lbs/day (Total VOC: paint and solvent)	0.56 lbs/day (Total VOC)
Placerville Body Shop	Automotive Collision Repair – Surface Prep	40 lbs/day (Total VOC: paint and solvent)	2.15 lbs/day (Total VOC)
Solis Collision Center	Automotive Collision Repair – Surface Prep	30 lbs/day (Total VOC: paint and solvent)	3.15 lbs/day (Total VOC)
South Side Auto Body	Automotive Collision	8 lbs/day (Total	1.28 lbs/day

(Tahoe)	Repair – Surface Prep	VOC: paint and solvent)	(Total VOC)
Stymeist Auto Body	Automotive Collision Repair – Surface Prep	10 lbs/day (Total VOC: paint and solvent)	2.27 lbs/day (Total VOC)
Welcome’s Auto Body (Tahoe)	Automotive Collision Repair – Surface Prep	10 lbs/day (Total VOC: paint and solvent)	4.94 lbs/day (Total VOC)

Most if not all of these facilities have converted to use of water-based solvents and most use acetone as a surface preparation and cleanup solvent, which is a VOC exempt compound. Even though several of the sources above have permit limits exceeding the 15 lbs/day applicability threshold from the solvent cleaning CTG, none of the sources exceed 5 lbs/day of *total actual* VOC emissions, which includes VOC emissions from both solvents and coatings. Therefore, there are no sources in El Dorado County subject to CTG EPA-453/R-06-001.

Richard Rhoads, Director of the Control Programs Development Division (MD-15) in the EPA’s Office of Air Quality Planning and Standards issued a memo dated September 7, 1978 clarifying exemptions to the 1977 CTG. The memo states that in jurisdictions with populations less than 200,000 people, sources not exceeding 100 tons per year potential to emit VOCs are not subject to the CTG. As shown above, the District has evaluated all potential sources of solvent cleaning and determined there are none with the potential to emit 100 tons VOC or more annually. Additionally, the U.S. Census population of El Dorado County in 2010 was 181,057 people. The Negative Declaration previously adopted by the El Dorado County Air Board of Directors on December 11, 2012 and approved by the EPA is still valid; therefore, there are no sources in El Dorado County subject to CTG EPA-450/2-77-022.

Tanks, Fixed and Floating:

The CTG for fixed roof petroleum tanks applies to tanks that are greater than 420,000 gallons in capacity used to store crude oil and condensate prior to transfer and to tanks greater than 40,000 gallons that store volatile petroleum liquids with a true vapor pressure greater than 10.5 kPa (1.5psia). The floating roof petroleum tank CTG also only applies to tanks greater than 40,000 gallons. There are no “bulk terminals” (facilities that receive and store petroleum products by pipeline or facilities with >20,000 gallons/day throughput) and there are only three “bulk plants” (facilities with <20,000 gallons/day throughput) within El Dorado County that have large storage tanks located in Placerville, Diamond Springs, and South Lake Tahoe. These bulk plants are all associated with cardlock gas dispensing facilities. The Placerville site has three 20,000 gallon and one 13,000 gallon above ground tanks. The Diamond Springs site has one 20,000 gallon and two 8,000 gallon tanks “above-ground” (they are actually below-ground but are considered “above ground” as they are contained with concrete vaults). South Lake Tahoe has one 20,000 gallon and two 14,000 gallon above ground tanks. All tanks have fixed roofs; there are no floating roof tanks in El Dorado County. Therefore, there are no sources in El Dorado County subject to CTGs EPA-450-2-77-036 & EPA-450-2-78-047.

Wood Furniture Production/Coatings:

The District reviewed the permit database and emissions inventory and consulted with district inspectors to determine if there are any wood furniture coaters in El Dorado County. The 1996 wood furniture coating CTG applies to sources with the potential to emit 25 tons per year of VOC’s. The following list contains permitted and exempt wood coating companies operating within El Dorado County with the latest actual VOC emissions data:

Facility	Industry or Process	Potential (Permitted) Emissions	Actual Emissions
Burleson Antiques	Furniture Refinishing	No permit. VOC emissions <2lbs/day ⁵	<2lbs/day
Cook Custom Cabinets	Cabinet Making/Refinishing	2 tons/year	2,006 lbs/yr
Impact Photographics	Wood Display Case Making/Coating	1.5 tons/year	357 lbs/yr
Redline Restoration	Furniture Refinishing	1 ton/year	1,460 lbs/yr
Rich & Mike's Cabinets	Cabinet Making & Refinishing	No permit. VOC emissions <2lbs/day	<2lbs/day
The Door Stop	Door & Window Coating	No permit. VOC emissions <2lbs/day	<2lbs/day

As indicated in the table above, there are no sources with the potential to emit 25 tons/year or more VOC. Therefore, there are no sources in El Dorado County subject to EPA-453/R-96-007.

PROPOSED NEGATIVE DECLARATIONS

The following table lists all Negative Declarations proposed to be adopted by the District:

Table C: Negative Declarations			
EPA Report #	Category	Title	District Status
EPA-450/2-77-008	Cans, Coils, Paper, Fabrics, Auto and Light-Duty Truck Assembly Coating.	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks	No Sources
EPA-450/2-77-022	Solvent Metal Cleaning	Control of Volatile Organic Emissions from Solvent Metal Cleaning	Sources Below CTG cutpoints
EPA-450/2-77-025	Petroleum Refineries	Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds	No Sources
EPA-450/2-77-026	Tank Truck Gasoline Bulk Loading Terminals	Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals	No Sources
EPA-450/2-77-032	Metal Furniture Coating	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume III: Surface Coating of Metal Furniture	No Sources

⁵ AQMD Rule 501 General Permit Requirements (June 6, 2006) Section 501.1.N allows equipment that emits less than 2 pounds of any pollutant in any 24 hour period to be exempted from permitting requirements.

Table C: Negative Declarations

EPA Report #	Category	Title	District Status
EPA-450/2-77-033	Magnet Wire Coating	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume IV: Surface Coating of Insulation of Magnet Wire	No Sources
EPA-450/2-77-034	Large Appliance Coating	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume V: Surface Coating of Large Appliances	No Sources
EPA-450/2-77-036	Tanks, Fixed-Roof	Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed-Roof Tanks	Sources Below CTG cutpoints
EPA-450/2-78-015	Metal & Plastic Parts Coatings	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VI: Surface Coating of Miscellaneous Metal Parts and Products	Sources Below CTG cutpoints
EPA-450/2-78-032	Flat Wood Paneling Coating	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VII: Factory Surface Coating of Flat Wood Paneling	No Sources
EPA-450/2-78-036	Petroleum Refineries	Control of Volatile Organic Compound Leaks from Petroleum Refinery Equipment	No Sources
EPA-450/2-78-029	Pharmaceutical Products	Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products	No Sources
EPA-450/2-78-030	Rubber Tires	Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires	No Sources
EPA-450/2-78-033	Graphic Arts	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VIII: Graphic Arts-Rotogravure and Flexography	Sources Below CTG cutpoints
EPA-450/2-78-047	Tanks, Floating-Roof	Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks	Sources Below CTG cutpoints
EPA-450/3-82-009	Petroleum Dry Cleaners	Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners	Sources Below CTG cutpoints
EPA-450/3-83-008	Polystyrene/ Polyethylene/ Polypropylene Resins Manufacturing	Control of Volatile Organic Compound Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins	No Sources
EPA-450/3-83-007	Natural Gas/ Gasoline Processing Plants	Control of Volatile Organic Compound Equipment Leaks from Natural Gas/Gasoline Processing Plants	No Sources

Table C: Negative Declarations

EPA Report #	Category	Title	District Status
EPA-450/3-83-006	Polystyrene/ Polyethylene/ Polypropylene Resins Manufacturing	Control of Volatile Organic Compound Leaks from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment	No Sources
EPA-450/3-84-015	Synthetic Organic Chemical Manufacturing	Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry	No Sources
EPA-450/4-91-031	Synthetic Organic Chemical Manufacturing	Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry	No Sources
EPA-453/R-96-007	Wood Furniture Manufacturing	Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations	Sources Below CTG cutpoints
EPA-453/R-94-032	Ship Coating	Alternative Control Technology Document – Surface Coating Operations at Shipbuilding and Ship Repair Facilities	No Sources
61 FR-44050	Ship Coating	Control Techniques Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating) <i>Note – See also EPA-453/R-94-032.</i>	No Sources
59 FR-29216	Aerospace Coating	Aerospace MACT <i>Note – See also EPA-453/R-97-004.</i>	No Sources
EPA-453/R-97-004	Aerospace Coating	Aerospace (CTG & MACT) <i>Note – See also 59 FR-29216, June 6, 1994.</i>	No Sources
EPA-453/R-06-001	Solvent Cleaning	Control Techniques Guidelines for Industrial Cleaning Solvents	Sources Below CTG cutpoints
EPA-453/R-06-002	Graphic Arts	Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing	Sources Below CTG cutpoints
EPA-453/R-06-003	Graphic Arts	Control Techniques Guidelines for Flexible Package Printing	No Sources
EPA-453/R-06-004	Flat Wood Paneling	Control Techniques Guidelines for Flat Wood Paneling Coatings	No Sources
EPA 453/R-07-003	Paper, Film, Foil Coatings	Control Techniques Guidelines for Paper, Film, and Foil Coatings	No Sources
EPA 453/R-07-004	Large Appliance Coatings	Control Techniques Guidelines for Large Appliance Coatings	No Sources

Table C: Negative Declarations			
EPA Report #	Category	Title	District Status
EPA 453/R-07-005	Metal Furniture Coatings	Control Techniques Guidelines for Metal Furniture Coatings	No Sources
EPA 453/R-08-003	Metal & Plastic Parts Coatings	Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings	Sources Below CTG cutpoints
EPA 453/R-08-004	Fiberglass Boat Manufacturing	Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials	No Sources
EPA 453/R-08-005	Adhesives, Industrial	Control Techniques Guidelines for Miscellaneous Industrial Adhesives	No Sources or Sources Below CTG cutpoints
EPA 453/R-08-006	Auto and Light-Duty Truck Assembly Coating.	Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings	No Sources
		<i>Note – See also EPA-453/R-08-002.</i>	
EPA 453/B-16-001	Oil and Natural Gas Industry	Control Techniques Guidelines for the Oil and Natural Gas Industry	No Sources

The proposed Negative Declaration submittals are exempt from the California Environmental Quality Act (CEQA) pursuant to (1) CEQA Guideline section 15061(b)(3) (Cal. Code Regs., tit. 14, § 15061(b)(2)) as the action does not have the potential of causing a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and thus does not constitute a “project” under California Public Resources Code section 21065; and (2) CEQA Guideline sections 15061(b)(2) and 15308 (Cal. Code Regs., tit. 14, §§ 15061(b)(2), 15308)) as it involves authorized actions taken by regulatory agencies for the protection of the environment under CEQA.

Step 3: Identify all SIP-approved District rules, determine if there are major sources of emissions or non-major sources that are still subject to the applicable CTG, and determine if the rule meets RACT standards if necessary.

As identified above, there are no major sources of emissions (i.e., no sources emitting or having the potential to emit at least 25 tons per year NOx or VOC) in El Dorado County. The following table identifies District Rules currently in the SIP and any applicable CTG. An analysis of each rule follows the table.

Table D: District Rules Currently in State Implementation Plan					
Rule No.	Rule Title	Applicable CTG(s)	Date Rule Adopted	Date Last Amended	SIP Approval - FR Citation
215	Architectural Coatings	None	9/27/94	Not Amended	7/18/96 61 FR 37390

Table D: District Rules Currently in State Implementation Plan					
Rule No.	Rule Title	Applicable CTG(s)	Date Rule Adopted	Date Last Amended	SIP Approval - FR Citation
224	Cutback and Emulsified Asphalt Paving Materials	EPA-450/2-77-037 Cutback Asphalt	9/16/91	6/6/94	8/21/95 60 FR 43383
225	Organic Solvent Cleaning and Degreasing Operations	EPA-453/R-06-001 Industrial Cleaning Solvents	9/27/94	Not Amended	8/21/95 60 FR 43383
235	Surface Preparation and Cleanup	EPA-450/2-77-022 Solvent Metal Cleaning	6/27/95	Not Amended	4/30/1996 61 FR 18962
229	Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters	None	1/23/01	Not Amended	10/10/01 66 FR 51578
230	Automotive Refinishing Operations	None	9/27/94	Not Amended	4/30/96 61 FR 18962
231	Graphic Arts Operations	EPA-453/R-06-002 Offset Lithographic Printing & Letterpress Printing, EPA-453/R-06-003 Flexible Package Printing EPA-450/2-78-033 Graphic Arts-Rotogravure & Flexography	9/27/94	Not Amended	7/11/97 62 FR 37136
232	Biomass Boilers	None	9/25/01	Not Amended	10/14/03 68 FR 59121
233	Stationary Internal Combustion Engines	None	6/11/02	Amended 6/6/06	9/13/02 67 FR 57960
234	VOC RACT Rule-Sierra Pacific Industries	None	4/25/95	Not Amended	9/12/95 60 FR 47273
236	Adhesives	EPA-453/R-08-005 Miscellaneous Industrial Adhesives	7/25/95	Not Amended	7/18/96 61 FR 37390
237	Wood Products Coating	EPA-453/R-96-007 Wood Furniture Coatings	6/27/95	Not Amended	4/30/96 61 FR 18962
238	Gasoline Transfer and Dispensing	EPA-450/R-75-102 Stage I Vapor Control Systems	3/27/01	Not Amended	8/27/01 66 FR 44974
239	Natural Gas-fired Residential Water Heaters	None	3/24/98	Not Amended	3/30/99 64 FR 15129
244	Organic Liquid Loading and Transport Vessels	EPA-450/2-78-051 Gasoline Tank Trucks EPA-450/2-77-026 Tank Truck Gasoline Loading Terminals EPA-450/2-77-035 Gasoline	3/27/01	9/25/01	7/8/02 67 FR 45067

Table D: District Rules Currently in State Implementation Plan					
Rule No.	Rule Title	Applicable CTG(s)	Date Rule Adopted	Date Last Amended	SIP Approval - FR Citation
		Bulk Plants			
245	Valves and Flanges	None	3/27/01	Not Amended	8/27/01 66 FR 44974

Rule 215 - Architectural Coatings (9/27/94)

Rule 215 – Architectural Coating is an area source rule. There is no applicable CTG and there are no major sources of emissions in this category. Therefore, this rule is not subject to RACT. However, the District intends to adopt CARB's 2007 Suggested Control Measure (SCM) for Architectural Coatings as the next rule update.

Rule 224 - Cutback and Emulsified Asphalt Paving Material (6/6/94)

This rule prohibits the use of rapid cure cutback asphalt, medium cure cutback asphalt, and low cure cutback asphalt which contains more than 0.5% organic compounds which evaporate at 500F or lower. Also prohibited is emulsified asphalt that contains more than 3% organic compounds that evaporate at 500F or lower. The CTG as clarified by EPA's "Bluebook" limits solvent content to 7% for all applications or 3-12% depending on application. The rule meets RACT and EPA-450-2-77-037.

Rule 225 - Organic Solvent Cleaning and Degreasing Operations (9/27/94) & Rule 235 Surface Preparation and Cleanup (6/27/95)

As indicated in Step 2 above, the 2006 CTG applies to industries that use organic solvent for cleaning operations such as mixing vessels (tanks), spray booths, and parts cleaners, where a facility emits at least 6.8 kg/day (15 lb/day) of VOC before consideration of controls in an ozone nonattainment area. The cleaning activities for removal of foreign material from substrate being cleaned include actions (activities) such as wiping, flushing, or spraying.

As detailed in Step 2 above, the District reviewed the permit database and emissions inventory and consulted with district inspectors to determine if any industries using cleaning solvents in El Dorado County exceed 15 lbs/day VOC emissions. No sources were found to be subject to the CTG. Additionally, Richard Rhoads, Director of the Control Programs Development Division (MD-15) in the EPA's Office of Air Quality Planning and Standards issued a memo dated September 7, 1978 clarifying exemptions to the previous 1977 CTG. The memo states that in jurisdictions with populations less than 200,000 people, sources not exceeding 100 tons per year potential to emit VOCs are not subject to the CTG. As shown in Step 2, the District has evaluated all potential sources of solvent cleaning and determined there are none with the potential to emit 100 tons VOC or more annually. Finally, the U.S. Census population of El Dorado County in 2010 was 181,057 people. The Negative Declaration previously adopted by the El Dorado County Air Board of Directors on December 11, 2012 and approved by the EPA is still valid, therefore, there are no sources in El Dorado County subject to CTG EPA-450/2-77-022, and the rule is not subject to RACT.

Rule 229 - Industrial, Institutional, & Commercial Boilers, Steam Generators, & Process Heaters (1/23/01)

This rule applies to boilers, steam generators, and process heaters with rated inputs greater than 5 million BTU/hr used in industrial, institutional, and commercial applications. There is no applicable CTG for this source category. The District reviewed the permit database and emissions inventory and consulted with district inspectors to compile the following list of boilers under District permit per this rule.

There are twelve total boilers in El Dorado County that exceed 5 million BTU/hr and are thus subject to Rule 229. However, ten are located in South Lake Tahoe, which is not in the Sacramento Federal Nonattainment Area (SFNA) and not in the Mountain Counties Air Basin. Therefore, they are not subject to RACT. While the Tahoe area in the Lake Tahoe Air Basin is in attainment of the federal ozone standard, it is designated non-attainment transitional for the state 8-hour ozone standard, which is also 70ppb. Thus, Tahoe area sources have been included in the analysis. All boilers subject to Rule 229 are required to source test annually.

If “Actual Throughput” is marked “Not Relevant” in the table below, it means the potential emissions assumed unrestricted 24-hour daily operation and those emissions, combined with all facility-wide emissions, do not exceed the “major source” definition of 25 tons per year.

Facility	Equipment	Fuel	Permit Maximum	Potential (Permitted) Emissions (tons/yr)	Actual Throughput 2015	Actual Emissions 2015 (tons/yr)
Marshall Hospital	5 million BTU/hr boiler	Propane	6,700 hr/yr	0.18 VOC 2.38 NOx	1,046.3 hrs	0.029 VOC 0.372 NOx
Marshall Hospital	5 million BTU/hr boiler	Propane	6,700 hr/yr	0.18 VOC 2.38 NOx	1,407.5 hrs	0.038 VOC 0.5 NOx
Barton Memorial Hospital (Tahoe)	5.907 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.14 VOC 0.48 NOx	Not relevant	Not relevant
Barton Memorial Hospital (Tahoe)	5.907 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.14 VOC 0.48 NOx	Not relevant	Not relevant
Barton Memorial Hospital (Tahoe)	5.907 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.14 VOC 0.48 NOx	Not relevant	Not relevant
Lake Tahoe Resort Hotel (Tahoe)	7 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.17 VOC 3.01 NOx	Not relevant	Not relevant
Lake Tahoe Resort Hotel (Tahoe)	7 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.17 VOC 3.01 NOx	Not relevant	Not relevant
Marriot Grand Residence (Tahoe)	14.7 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.7 VOC 3.16 NOx	Not relevant	Not relevant
Marriot Grand Residence (Tahoe)	14.7 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.7 VOC 3.16 NOx	Not relevant	Not relevant

Marriot Grand Residence PADMA (Tahoe)	14.7 million BTU/hr boiler	Natural Gas	500 hrs/yr	0.02 VOC 0.36 NOx	400 hrs	0.02 VOC 0.29 NOx
LTUSD South Tahoe High School (Tahoe)	16.738 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.79 VOC 7.17 NOx	Not relevant	Not relevant
LTUSD South Tahoe High School (Tahoe)	16.738 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.79 VOC 7.17 NOx	Not relevant	Not relevant

Below are the facility-wide emissions of the sources with boilers subject to Rule 229; none of which exceed 25 tpy VOC or NOx emissions:

Facility	Equipment	Facility-wide Potential Emissions 2015 (tons/yr)
Marshall Medical	2 boilers >5MMBTU/hr 9 boilers <5MMBTU/hr 1 EtO Sterilizer 4 emergency engines	1.19 VOC 13.13 NOx
Barton Memorial Hospital	3 emergency engines 3 boilers >5MMBTU/hr Multiple boilers <5MMBTU/hr	1.6 VOC 3.86 NOx
Lake Tahoe Resort	1 emergency engine 2 boilers >5MMBTU/hr	0.33 VOC 6.17 NOx
Marriott Grand Residence	1 emergency engine 3 boilers >5MMBTU/hr 1 boiler <5MMBTU/hr	1.6 VOC 7.39 NOx
LTUSD South Tahoe High School	2 boilers >5MMBTU/HR Multiple boilers <5MMBTU/hr	0.82 VOC 14.9 NOx

Rule 230 - Automotive Refinishing Operations (9/27/94)

This rule applies to automotive refinishing operations (repair) while CTG EPA-450-2-77-008 and EPA 453/R-08-006 apply to coating of new automotive and light-duty trucks in assembly plants. There are no automotive/truck assembly plants in El Dorado County, therefore, no sources are subject to CTG EPA-450-2-77-008 or EPA 453/R-08-006.

Additionally, none of the facility-wide emissions from automotive refinishing operations in El Dorado County exceed the major source definition of emitting or having a potential to emit at least 25 tpy as identified below:

Facility	Industry & Process	Potential Total Paint & Solvent Emissions	Actual Total VOC Emissions 2015
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		(tons/year)	(tons/year)
Caliber Collision	Automotive Collision Repair	1.27	None yet (construction complete Jan 2016)
California Colors (Tahoe)	Automotive Collision Repair	4.05	0.07
Cameron Park Auto Body	Automotive Collision Repair	1.96	0.11
Cooks Collision	Automotive Collision Repair	3.4	0.25
Frank's Body Shop	Automotive Collision Repair	10.7	0.21
Fulmer's Auto Body	Automotive Collision Repair	1.29	0.16
G & O Body Shop	Automotive Collision Repair	1.31	0.55
Hangtown Body Shop	Automotive Collision Repair	5.86	0.14
Kniessel's Collision Center	Automotive Collision Repair	1.96	0.24
M & M Auto Body	Automotive Collision Repair	0.64	0.07
Placerville Body Shop	Automotive Collision Repair	5.22	0.28
Solis Collision Center	Automotive Collision Repair	3.92	0.41
South Side Auto Body (Tahoe)	Automotive Collision Repair	1.04	0.17
Stymeist Auto Body	Automotive Collision Repair	1.31	0.30
Welcome's Auto Body (Tahoe)	Automotive Collision Repair	1.31	0.65

As shown above, there are no major sources subject to Rule 230 Automotive Refinishing Operations in El Dorado County; therefore the rule is not subject to RACT.

Rule 231 - Graphic Arts Operations (9/27/94)

This rule applies to all graphic arts operations which emit more than 660 pounds of VOC per month (3.96 tons/year). As shown above in the Graphics Arts section of Step 2, DST Output is the only graphic arts operation under permit with AQMD and has actual emissions below the applicability threshold for the 2006 CTG for Lithographic and Letterpress printing. DST has a facility-wide quarterly VOC permit limit for all printing operations and an annual VOC limit of 3.97 tons. Additionally, the facility has an annual NOx emissions limit of 12.01 tons and VOC limit of 9.44 tons which includes the emissions from all printers, engines, boilers/heaters, and furnaces (see discussion in Rule 233 below for more detail). DST does not meet the major source definition of 25 tons per year emissions. There are no major sources subject to Rule 231 Graphic Arts Operations in El Dorado County; therefore, the rule is not subject to RACT.

Rule 232 - Biomass Boilers (9/25/01)

This rule applies to boilers and steam generators with rated heat inputs of greater than or equal to 5 million BTU per hour and which have a primary energy source of biomass consisting of a minimum of 75 percent of the total heat input. The District reviewed the permit database and emissions inventory and consulted with district inspectors to determine if there are any sources under permit pursuant to this rule and found none. Likewise, there are no major sources subject to Rule 232 Biomass Boilers in El Dorado County; therefore, the rule is not subject to RACT.

Rule 233 - Stationary Internal Combustion Engines (6/6/06)

The District reviewed the permit database and emissions inventory and consulted with district inspectors to determine if there are any stationary internal combustion engines (ICE) in El Dorado County that emit more than 25 tpy NOx. Most of the stationary ICE's in the county are emergency backup power generators and rarely operate. There are two large prime power engines that can run on natural gas or diesel with the greatest potential of reaching "major source" emissions levels. Located at DST Output in El Dorado Hills, they are both required to perform source testing to ensure the equipment emissions do not exceed 0.15 g/bhp-hr, in addition to a runtime limit of 2,166 hours per quarter.

Facility	Equipment	Maximum Permit Limit (hrs/yr)	Potential (Permitted) Emissions (tons/yr)	Actual Operation (hr/yr)	Actual Emissions (tons/yr)
DST Output 13-1297	2,961 bhp Prime Power Natural Gas/Diesel Engine	8,664	4.24 VOC 4.24 NOx	2,880	1.41 VOC 1.41 NOx
DST Output 13-1298	2,961 bhp Prime Power Natural Gas/Diesel Engine	8,664	4.24 VOC 4.24 NOx	4,798	2.35 VOC 2.35 NOx

In addition, the DST Output facility-wide potential emissions do not exceed 25 tons per year VOC or NOx as detailed below:

Facility	Equipment	Potential (Permitted) Emissions (tons/yr)	Actual Emissions (tons/yr)
DST Output	40 printers	3.97 VOC	1.77 VOC
DST Output	6 engines (generators, includes 13-1297 & 13-1298 above (prime power) and 4 emergency backup engines)	8.55 VOC 9.86 NOx	3.79 VOC 4.39 NOx
DST Output	Heating system comprised of 43 furnaces & boilers	0.05 VOC 2.15 NOx	0.05 VOC 2.15 NOx (assumed max as no method to track throughput.)

Total VOC Potential to Emit	Total NOx Potential to Emit	Total VOC Actuals	Total NOx Actuals
9.44 tpy	12.01 tpy	5.61 tpy	6.54 tpy

As shown, DST Output, El Dorado County's largest stationary source of emissions, does not exceed 25 tpy on a facility-wide basis for VOC or NOx both by potential and actual emissions. Therefore, Rule 233 is not subject to RACT.

Rule 234 - VOC RACT Rule-Sierra Pacific Industries (4/25/95)

Rule 234 addresses RACT for the county's only (previous) major source: Sierra Pacific Industries (SPI). As noted above, SPI operated a Biomass Boiler and was regulated under SIP-approved District Rules 232 Biomass Boilers (Fed. Reg. Publication Date 10/14/2003) and Rule 234 VOC RACT Rule – Sierra Pacific Industries (Fed. Reg. Publication Date 9/12/1995). Rule 234 requires a VOC limit of 150 ppmv for boilers exceeding the calendar year average of 50,000 lbs/hr steam. This was determined by the "RACT Determination for Michigan-California Lumber Company Technical Support Documentation" prepared by Radian for EPA-Region IX in December 1993. The analysis is still appropriate.

SPI ceased operation of the Biomass Boiler in 2009 and dismantled the unit in 2013. There are no Title V or major sources left in El Dorado County or any sources to which Rule 234 would apply. Therefore, Rule 234 is not subject to RACT.

Rule 236 - Adhesives (7/25/95)

This rule applies to sources which use 10 gallons or more per year of adhesives. The District reviewed the permit database and emissions inventory and consulted with district inspectors to determine if there are any sources under permit pursuant to this rule and found none. Likewise, there are no major sources subject to Rule 236 Adhesives in El Dorado County; therefore, the rule is not subject to RACT.

Rule 237 - Wood Products Coatings (6/27/95)

This rule applies to sources applying a total of 20 gallons or more per month of coatings, inks, stains, and/or strippers in wood product coating operations for the purpose of manufacture of wood products, including furniture and other coated objects made of solid wood and/or wood composition, and/or simulated wood material. The District reviewed the permit database and emissions inventory and consulted with district inspectors to determine wood coating sources in El Dorado County. The following list contains permitted and exempt wood coating companies operating within El Dorado County with the latest actual VOC emissions data:

Facility	Industry or Process	Potential (Permitted) Emissions	Actual Emissions
Burleson Antiques	Furniture Refinishing	No permit. VOC emissions <2 lbs/day ⁶	<2 lbs/day
Cook Custom Cabinets	Cabinet Making/Refinishing	2 tons/year	2,006 lbs/yr
Impact Photographics	Wood Display Case Making/Coating	1.5 tons/year	357 lbs/yr
Redline Restoration	Furniture Refinishing	1 ton/year	1,460 lbs/yr
Rich & Mike's Cabinets	Cabinet Making/Refinishing	No permit. VOC emissions <2 lbs/day	<2 lbs/day
The Door Stop	Door & Window Coating	No permit. VOC emissions <2 lbs/day	<2 lbs/day

⁶ AQMD Rule 501 General Permit Requirements (June 6, 2006) Section 501.1.N allows equipment that emits less than 2 pounds of any pollutant in any 24 hour period to be exempted from permitting requirements.

As indicated in the table above, there are no sources with the potential to emit 25 tons/year or more VOC. Similarly, there are no facilities that exceed the threshold of 25 tons/year for the CTG for Wood Furniture Manufacturing Operations (EPA-453/R-96-007). There are no major sources in El Dorado County subject to Rule 237 Wood Products Coatings; therefore, the rule is not subject to RACT.

Rule 238 - Gasoline Transfer & Dispensing (3/27/01)

This covers both gasoline transfer into stationary storage tanks and mobile fuelers (Phase I) and gasoline transfer into vehicle fuel tanks (Phase II) and was included in the SIP by EPA on August 8, 2001. This rule meets CARB Phase I Enhanced Vapor Recovery requirements and is consistent with other district rules in the region, such as Sacramento Metropolitan Air Quality Management District (SMAQMD) Rule 448 (2/26/09) Gasoline Transfer into Stationary Storage Containers and Placer County APCD (PCAPCD) Rule 213 (2/21/13) Gasoline Transfer Into Stationary Storage Containers.

Rule 238 is consistent with SMAQMD Rule 449 Transfer of Gasoline into Vehicle Fuel Tanks and PCAPCD Rule 214 and their emissions efficiency requirements. In fact, Rule 238 does not contain the various exemptions for emergency motor vehicles, implements of husbandry, low use maintenance inspections, E85 dispensing, and ORVR that are included in SMAQMD Rule 449. Therefore, Rule 238 Gasoline Transfer and Dispensing meets RACT.

Rule 239 - Natural Gas-Fired Residential Water Heaters (3/24/98)

This rule applies to natural gas-fired residential water heaters with a rated input capacity less than 75,000 Btu/hr. Water heaters used in recreational vehicles, swimming pools, and spas or that use any other fuel are exempt from this rule. There are no major sources in El Dorado County subject to this rule. Since the rule is limited to natural gas-fired water heaters less than 75,000 btu/hr, using AP-42 emissions factors, the following table was compiled to estimate the number of 75,000 btu/hr water heaters a facility would need to emit 25 tons per year NOx to be considered a major source.

Emissions from one 75,000 Btu/hr heater operating full on 24 hours/day for 1 year						
Capacity (Btu/hr)	Operating Hours	Fuel Burned (mmcf/yr)	Emission Factor (lbs/mmcf)		Potential Emissions (tons per year)	
			NOx	VOC	NOx	VOC
0.075	8,760	0.64	94	5.5	0.03	0.002

A facility would need to have $25/0.03 = 826$ water heaters operating at full power every hour for one year to emit 25 tons NOx. There are no facilities of this size in El Dorado County nor are there any facilities that have residential natural-gas fired water heaters, when added to all other emission sources at a facility, that emit more than 25 tpy. Additionally, natural gas service is limited to El Dorado Hills and South Lake Tahoe in El Dorado County, and the rule is limited to "residential" water heaters. Therefore, Rule 239 is not subject to RACT.

Rule 244 - Organic Liquid Loading and Transport Vessels (9/25/01)

This rule requires a CARB certified or District approved vapor recovery/disposal system which has a recovery efficiency of 99% or 0.08 lb of non-methane vapor emitted per 1,000 gallons transferred. The Gasoline Tank trucks CTG presents submerged filling and vapor balance system. Additionally, the District compared this rule to similar rules from the Bay Area AQMD, San Joaquin Unified APCD, South Coast AQMD, and Ventura County APCD and determined those rules did not contain more stringent requirements than Rule 244 with one exception. The

exception is that the BAAQMD emission standards for gasoline loading at bulk terminals (0.04 lb/1,000 gal) is lower than the EDCAQMD standards (0.08 lb/1,000 gal). However, as determined above, there are no bulk terminals in El Dorado County. This rule meets RACT and CTG EPA-450-2-78-051.

As indicated in Table A, there are no “bulk terminals” (facilities that receive and store petroleum products by pipeline or facilities with >20,000 gallons/day throughput) in El Dorado County. Therefore, there are no sources subject to CTG EPA-450-2-77-026.

The CTG for gasoline bulk plants applies to those facilities with less than 20,000 gallons/day throughput. There are only three “bulk plants” (facilities with <20,000 gallons/day throughput) within El Dorado County; one located in Placerville, Diamond Springs, and South Lake Tahoe. These bulk plants are all associated with cardlock gas dispensing facilities. The cardlock portions, while not subject to the CTG, are shown to provide a facility-wide emissions amount. All three sources are CARB certified with Phase I and Phase II vapor recovery and required to be compliant with District Rule 238 Gasoline Dispensing Facilities.

Facility	Process	CARB Cert	Maximum Permit Throughput (gal/yr)	Potential (Permitted) Emissions (lbs/yr)	Actual Throughput (gal/yr)	Actual Emissions 2015 (lbs/yr)
Hunt & Sons Placerville	Bulk tank loading & truck loading	G-70-102	2,000,000	1,892	1,871,834 (5,128 gal/day)	1,770.75*
	Card Lock – Fuel Dispensing	G-70-164	1,000,000	1,520	543,787 (1,490 gal/day)	826.56
Flyers Energy #751 (Tahoe)	Bulk tank loading & truck loading	G-70-124	1,500,000	1,419	586,848 (1,608 gal/day)	512.62*
	Card Lock – Fuel Dispensing	G-70-175 G-70-199	750,000	1,140	289,969 (794 gal/day)	440.75
Dawson Oil Cardlock	Bulk tank loading & truck loading	VR-102	250,000	146	95,711 (262 gal/day)	55.7
	Card Lock – Fuel Dispensing	G-70-52 G-70-199	1,975,000	2,508	637,590 (1,747 gal/day)	809.74

* Discrepancy in emissions is due to different emission factors used for Scenario 3B and 6B of CAPCOA's *Gasoline Service Station Industrywide Risk Assessment Guidelines (Nov 1997)*.

EPA's “Blue Book” (and reasserted in the model VOC rule (pg 122) for bulk plants) indicates that bulk plants with an average daily throughput of gasoline less than 4,000 gallons on a 30-day rolling average are only subject to the requirement for submerged fill, observation for vapor/liquid leaks, and maintaining records.⁷ The Hunt & Sons Bulk Plant does exceed this 4,000 gal/day on a 30-day rolling average threshold. Therefore, Rule 244 is subject to RACT and CTG EPA-450-2-77-035.

⁷ Both the EPA Blue Book (pg 2-18) and the VOC Model Rules (pg 122) state that any facility that exceeds the applicability threshold will remain subject to the CTG even if its throughput or emissions later falls below the applicability threshold.

The CTG presents submerged filling and vapor balance system. Rule 244 requires a CARB certified or District approved vapor recovery/disposal system which has a recovery efficiency of 99% or 0.08 lb of non-methane vapor emitted per 1,000 gallons transferred. All three sources are CARB certified. Therefore, Rule 244 meets RACT and CTG EPA-450-2-77-035.

Rule 245 - Valves and Flanges (3/27/01)

Rule 245 is an area source rule for which there is no CTG. It applies to all valves and flanges in reactive organic compound service. There are no major sources in El Dorado County; therefore, the rule is not subject to RACT.

Step 4: Identify District actions required based on the RACT analysis.

RACT Findings

Negative Declarations can be adopted for the CTGs listed in Table C. This is based on staff review of District sources and verification that the District does not have sources meeting the applicability criteria for the CTGs identified in Table C. In addition, the Staff analysis found there were no major stationary sources of VOC or NO_x, and no non-CTG major sources, for which District rules satisfying RACT had not been adopted. Finally, staff finds that all other district SIP-approved rules either meet RACT or are not subject to RACT requirements. Staff recommends that the District Board make the declaration that no existing Stationary Sources subject to a CTG for VOC exist in El Dorado County in the specified CTG source categories and that no major non-CTG Sources exist for which RACT measures have not been adopted. Staff further recommends that these SIP submittals be found exempt from the California Environmental Quality Act (CEQA) per Title 14, California Code of Regulations, Chapter 3, Article 19, sections 15060(c)(2) & (3) as the action does not result in a direct or reasonably foreseeable indirect physical change in the environment, and does not constitute a “project”, and section 15308, Actions by Regulatory Agencies for the Protection of the Environment.

APPENDIX

List of Control Techniques Guidelines (CTG) and Summary of District Analysis

Control Techniques Guidelines (CTG)			
Pollutant	EPA Report	Description	District Status
VOC	EPA-450/R-75-102	Design Criteria for Stage I Vapor Control Systems – Gasoline Service Stations <i>Note – This document is regarded as a CTG although it was never published with an EPA document number.</i>	Rule 238 meets RACT/CTG
VOC	EPA-450/2-76-028	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume I: Control Methods for Surface Coating Operations <i>Note – Although often listed with the CTGs for historical reasons, this document does not define RACT for any source.</i>	N/A
VOC	EPA-450/2-77-008	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks	No Sources
VOC	EPA-450/2-77-022	Control of Volatile Organic Emissions from Solvent Metal Cleaning	Sources Below CTG cutpoints
VOC	EPA-450/2-77-025	Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds	No Sources
VOC	EPA-450/2-77-026	Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals	No Sources
VOC	EPA-450/2-77-032	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume III: Surface Coating of Metal Furniture	No Sources
VOC	EPA-450/2-77-033	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume IV: Surface Coating of Insulation of Magnet Wire	No Sources
VOC	EPA-450/2-77-034	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume V: Surface Coating of Large Appliances	No Sources
VOC	EPA-450/2-77-035	Control of Volatile Organic Emissions from Bulk Gasoline Plants	Rule 244 meets RACT/CTG
VOC	EPA-450/2-77-036	Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed-Roof Tanks	Sources Below CTG cutpoints
VOC	EPA-450/2-77-037	Control of Volatile Organic Emissions from Use of Cutback Asphalt	Rule meets RACT/CTG
VOC	EPA-450/2-78-022	Control Techniques for Volatile Organic Emissions from Stationary Sources <i>Note – This document is often listed with CTGs, but it does not define RACT for any particular source</i>	N/A

Control Techniques Guidelines (CTG)			
Pollutant	EPA Report	Description	District Status
VOC	EPA-450/2-78-015	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VI: Surface Coating of Miscellaneous Metal Parts and Products	Sources Below CTG cutpoints
VOC	EPA-450/2-78-032	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VII: Factory Surface Coating of Flat Wood Paneling	No Sources
VOC	EPA-450/2-78-036	Control of Volatile Organic Compound Leaks from Petroleum Refinery Equipment	No Sources
VOC	EPA-450/2-78-029	Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products	No Sources
VOC	EPA-450/2-78-030	Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires	No Sources
VOC	EPA-450/2-78-033	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VIII: Graphic Arts-Rotogravure and Flexography	Sources Below CTG cutpoints
VOC	EPA-450/2-78-047	Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks	Sources Below CTG cutpoints
VOC	EPA-450/2-78-050	Control of Volatile Organic Emissions from Perchloroethylene Dry Cleaning Systems <i>Note – Perchloroethylene has been exempted as a VOC, so this CTG is no longer relevant. However, there is a MACT standard for perchloroethylene dry cleaners.</i>	N/A
VOC	EPA-450/2-78-051	Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems	Rule 244 meets RACT/CTG
VOC	EPA-450/3-82-009	Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners	Sources Below CTG cutpoints
VOC	EPA-450/3-83-008	Control of Volatile Organic Compound Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins	No Sources
VOC	EPA-450/3-83-007	Control of Volatile Organic Compound Equipment Leaks from Natural Gas/Gasoline Processing Plants	No Sources
VOC	EPA-450/3-83-006	Control of Volatile Organic Compound Leaks from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment	No Sources
VOC	EPA-450/3-84-015	Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry	No Sources
VOC	EPA-450/4-91-031	Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry	No Sources

Control Techniques Guidelines (CTG)			
Pollutant	EPA Report	Description	District Status
VOC	EPA-453/R-96-007	Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations <i>Note – Wood Furniture (CTG-MACT) – Draft MACT out 5-1994; Final CTG issued 4-1996. See also 61 FR-25223, May 20, 1996 and 61 FR-50823, September 27, 1996.</i>	Sources Below CTG cutpoints
VOC	EPA-453/R-94-032	Alternative Control Technology Document – Surface Coating Operations at Shipbuilding and Ship Repair Facilities <i>Note – For CTG, see 61 FR-44050, August 27, 1996</i>	No Sources
VOC	61 FR-44050	Control Techniques Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating) <i>Note – See also EPA-453/R-94-032.</i>	No Sources
VOC	59 FR-29216	Aerospace MACT <i>Note – See also EPA-453/R-97-004.</i>	No Sources
VOC	EPA-453/R-97-004	Aerospace (CTG & MACT) <i>Note – See also 59 FR-29216, June 6, 1994.</i>	No Sources
VOC	EPA-453/R-06-001	Control Techniques Guidelines for Industrial Cleaning Solvents	Sources Below CTG cutpoints
VOC	EPA-453/R-06-002	Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing	Sources Below CTG cutpoints
VOC	EPA-453/R-06-003	Control Techniques Guidelines for Flexible Package Printing	No Sources
VOC	EPA-453/R-06-004	Control Techniques Guidelines for Flat Wood Paneling Coatings	No Sources
VOC	EPA 453/R-07-003	Control Techniques Guidelines for Paper, Film, and Foil Coatings	No Sources
VOC	EPA 453/R-07-004	Control Techniques Guidelines for Large Appliance Coatings	No Sources
VOC	EPA 453/R-07-005	Control Techniques Guidelines for Metal Furniture Coatings	No Sources
VOC	EPA 453/R-08-003	Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings	Sources Below CTG cutpoints
VOC	EPA 453/R-08-004	Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials	No Sources
VOC	EPA 453/R-08-005	Control Techniques Guidelines for Miscellaneous Industrial Adhesives	No Sources or Sources Below CTG cutpoints
VOC	EPA 453/R-08-006	Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings <i>Note – See also EPA-453/R-08-002.</i>	No Sources

Control Techniques Guidelines (CTG)			
Pollutant	EPA Report	Description	District Status
VOC	EPA 453/R-08-002	Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Primer-Surfacer and Topcoat Operations <i>Note – See also EPA-453/R-08-006.</i>	N/A
VOC	EPA 453/B-16-001	Control Techniques Guidelines for the Oil and Natural Gas Industry	No Sources