

**EL DORADO COUNTY AIR QUALITY MANAGEMENT DISTRICT
AGENDA ITEM TRANSMITTAL
Meeting of February 6, 2007**

AGENDA TITLE: Public Hearing to adopt the proposed Reasonably Available Control Technology (RACT) State Implementation Plan Revision and Update Analysis

DEPARTMENT: EMD/AOMD	DEPT SIGNOFF: <i>Gerri Silva</i>	CAO USE ONLY:
CONTACT: Gerri Silva/Marcella McTaggart	<i>Marcella McTaggart</i>	<i>[Signature]</i> 1/18/07
DATE: 12/15/2006 PHONE: 6653/5306		

DEPARTMENT SUMMARY AND REQUESTED BOARD ACTION:
Hearing to consider adoption of the resolution approving the 2006 Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revisions and Update Analysis Staff Report as required by Sections 182(b)(2) and 182(f) of the Federal Clean Air Act, noting the AQMD rules either meet RACT or there are no sources in all Control Techniques Guidelines (CTG) categories except Coating of Miscellaneous Parts and Products. The AQMD will be required to implement a rule meeting RACT for the above category by January 1, 2009.

(Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Update Analysis Staff Report is on file with Board Clerk)

CAO RECOMMENDATIONS: *Recommend approval. Laura A. Gill 1/22/07*

Financial impact? () Yes (X) No	Funding Source: () Gen Fund (X) Other
BUDGET SUMMARY:	Other:
Total Est. Cost _____ \$0.00	CAO Office Use Only:
Funding	4/5's Vote Required () Yes (X) No
Budgeted _____ \$0.00	Change in Policy () Yes (X) No
New Funding _____ \$0.00	New Personnel () Yes (X) No
Savings _____ \$0.00	CONCURRENCES:
Other _____ 0.00	Risk Management
Total Funding _____ \$0.00	County Counsel
Change in Net County Cost _____ \$0.00	Other

***Explain**

BOARD ACTIONS:

<p>Vote: Unanimous _____ Or</p> <p>Ayes:</p> <p>Noes:</p> <p>Abstentions:</p> <p>Absent:</p> <p>Rev. 04/05</p>	<p>I hereby certify that this is a true and correct copy of an action taken and entered into the minutes of the Board of Supervisors</p> <p>Date: _____</p> <p>Attest: Cindy Keck, Board of Supervisors Clerk</p> <p>By: _____</p>
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EL DORADO
COUNTY



ENVIRONMENTAL
MANAGEMENT
DEPARTMENT

*Environmental
Health Division*

*Air Quality
Management
District*

*Solid Waste &
Hazardous
Materials
Divisions*

Vector Control



**PLACERVILLE
OFFICE**
2850 Fairlane Ct.
Building C
Placerville, CA 95667

Ph. 530.621.5300
Fax. 530.642.1531
Fax. 530.626.7130

**SOUTH LAKE
TAHOE OFFICE**
3368 Lake Tahoe Blvd.
Ste 303
South Lake Tahoe, CA
96150

Ph. 530.573.3450
Fax. 530.542.3364

COUNTY OF EL DORADO

ENVIRONMENTAL MANAGEMENT DEPARTMENT

December 15, 2006

El Dorado County
Air Quality Management District Board of Directors
330 Fair Lane
Placerville, CA 95667

Subject: Public Hearing to adopt the proposed 2006 Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision and Update Analysis Staff Report

Honorable Board Members:

□ **RECOMMENDATION:**

Hearing to consider adoption of the resolution approving the 2006 Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revisions and Update Analysis Staff Report as required by Sections 182(b)(2) and 182(f) of the Federal Clean Air Act, noting the AQMD rules either meet RACT or there are no sources in all Control Techniques Guidelines (CTG) categories except Coating of Miscellaneous Parts and Products. The AQMD will be required to implement a rule meeting RACT for the above category by January 1, 2009.

□ **BACKGROUND:**

In letters dated March 9, 2006, and April 4, 2006, Andrew Steckel, United States Environmental Protection Agency (EPA) Office Rulemaking Chief advised the California Air Resources Board (CARB) of requirements to update RACT control measures adopted by local air pollution control districts and included in the California SIP. CARB forwarded the letters to affected air pollution control districts, including the El Dorado County Air Quality Management District (EDCAQMD) for action. An updated analysis of RACT SIP requirements is required to be completed and submitted to EPA. Any new RACT SIP control measures identified in the analysis for El Dorado County must be adopted and implemented by January 1, 2009.

RACT is defined in the Code of Federal Regulations (CFR) 57 FR 55620, as "the lowest emission limitation that a unit is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility". Section 182(b)(2) of the Federal Clean Air Act requires districts, which contain areas designated moderate and worse non-attainment for ozone in their boundaries, to implement applicable Volatile Organic Compounds (VOC) RACT rules for stationary sources. Section 182(f) of the Federal Clean Air Act requires districts that are subject to the VOC RACT requirements

to also implement applicable Nitrogen Oxides (NOx) RACT rules for existing major stationary sources of NOx emissions. VOC and NOx are precursor compounds to the formation of ozone.

Since a portion of the EDCAQMD has been designated as “serious” non-attainment for the federal 8-hour ozone standard, the EDCAQMD is required to prepare a RACT SIP update document, covering Major Sources, non-Major Sources, and Major non-CTG Sources. A “Major Source” of VOCs or NOx in El Dorado County is defined as an emission source having a potential to emit of 50 tons either VOC or NOx per year.

□ **REASONS FOR RECOMMENDATION:**

The purpose of this staff report is to determine whether EDCAQMD rules meet RACT by comparing the control measures of existing EDCAQMD rules with current EPA standards. These standards are CTGs and Alternate Control Technique (ACT) Guidance published by EPA.

Summary of Findings: The following is a summary of the findings of the RACT SIP analysis that is in the enclosed 2006 RACT SIP Update Analysis Staff Report

Seven (7) EDCAQMD rules that satisfy RACT requirements have already been submitted to EPA and incorporated into the SIP

- One (1) new rule incorporating RACT requirements need to be adopted. A new prohibitory rule for VOCs from the coating of Metal Parts and Products, must be adopted, implemented and submitted for RACT SIP approval no later than January 1, 2009.
- There are no Major non-CTG Sources for which RACT measures have not been adopted. The analysis found that there are eighteen (18) CTG source categories for which no Stationary VOC Sources currently exist in El Dorado County and for which Negative Declarations must be made.

The Resolution was approved by County Counsel.

The Board Hearing to consider the adoption of above resolution was noticed in the Mountain Democrat and the Tahoe News Tribune. No public comments were received, but the proposed RACT SIP was modified based on EPA comments received.

□ **FISCAL IMPACT:**

There is no direct fiscal impact from this analysis. The finding that a new Prohibitory Rule for the coating of Metal Parts and Products must be adopted means that metal coaters may incur increased costs from compliance with measures that are included in the new rule. However, the VOC limits will be no lower than those implemented elsewhere and therefore

the fiscal impact on industry is expected to be minimal.

☐ **NET COUNTY COST:**

There is no net county cost.

☐ **ACTION TO BE TAKEN FOLLOWING APPROVAL:**

1. Upon adoption, the Board Clerk's office will forward copies of the resolution to the EDCAQMD.

2. EDCAQMD will forward the approved resolution to ARB for ARB Board approval and inclusion in the California RACT SIP submittal.

Respectfully,



Gerri Silva, M.S., REHS
Environmental Management Interim Director

Respectfully,



Marcella McTaggart
Air Pollution Control Officer

Attachments: (1) Resolution: Approval of the 2006 RACT SIP Update Analysis
(2) 2006 RACT SIP Update Analysis Staff Report
(3) Notice of CEQA Exemption

ATTACHMENT #1:

Resolution: Approval of the 2006 RACT SIP Update Analysis

CONTRACT ROUTING SHEET

Date Prepared: 10/10/2006

Need Date: 10/24/2006

PROCESSING DEPARTMENT:

Department: Environmental Mgmt
 Dept Contact: Kerri Williams
 Phone #: 5309
 Department: _____
 Head Signature: _____

CONTRACTOR:

Name: NA
 Address: _____
 Phone: _____

CONTRACTING DEPARTMENT: AIR-Environmental Management-CHARGE TO 422100

Service Requested: Review Resolution for Approval of RACT SIP Update Analysis

Contract Term: NA Contract/Amendment Value: \$0.00

Compliance with Human Resources requirements? Yes: No:

Compliance verified by: N/A

COUNTY COUNSEL: (Must approve all contracts and MOU's)

Approved: Disapproved: Date: 10/13/06 By: [Signature]
 Approved: Disapproved: Date: _____ By: _____

*See suggested changes pgs 1, 2 + 3
 No need to re-submit*

*Williams
 CAC 10/10/06*

*EL DORADO COUNTY
 2006 OCT 11 AM 10:10*

RISK MANAGEMENT: (All contracts and MOU's except boilerplate grant funding agreements)

Approved: Disapproved: Date: 10/16/06 By: [Signature]
 Approved: Disapproved: Date: _____ By: _____

THE ORIGINAL BLUE ROUTE IS WITH THE AGENDA PACKET SUBMITTED TO THE BOARD CLERKS OFFICE FOR THE 12-5-06 AGENDA. THIS ITEM WAS PULLED TO BE CONTINUED.

OCT 16 2006

OTHER APPROVAL: (S)

Departments:
 Approved: Disap
 Approved: Disap

Linda Milligin ext 6668



RESOLUTION NO. _____
OF THE BOARD OF DIRECTORS OF THE EL DORADO COUNTY
AIR QUALITY MANAGEMENT DISTRICT

RESOLUTION APPROVING 2006 REASONABLY AVAILABLE CONTROL
TECHNOLOGY (RACT) STATE IMPLEMENTATION PLAN (SIP)
UPDATE ANALYSIS

WHEREAS, Section 40001 of the Health and Safety Code of the State of California authorizes the El Dorado County Air Quality Management District, to adopt and enforce Rules and Regulations to achieve and maintain ambient air quality standards within the District; and

WHEREAS, Section 40702 of the Health and Safety Code of the State of California requires a district to adopt rules and regulations and do such acts as may be necessary or proper to execute the powers and duties granted; and

WHEREAS, Portions of the El Dorado County Air Quality Management District (EDCAQMD) have been designated as “serious” non-attainment areas for the federal 8-hour ozone standard pursuant to the Federal Clean Air Act Amendments of 1990 (FCAAA); and

WHEREAS, The FCAAA requires for non-attainment areas the submittal of Volatile Organic Compounds (VOC) and Nitrogen Oxides (NO_x) Reasonably Available Control Technology (RACT) rules covering all Major Stationary Sources of VOC and NO_x; and all applicable Control Techniques Guidelines (CTG) categories, and

WHEREAS, The Board of Directors of the EDCAQMD has determined in the 2006 RACT SIP Update Analysis that the EDCAQMD has adopted rules meeting RACT which cover all existing applicable CTG categories and all Major Stationary Sources of VOC or NO_x in the District; and

WHEREAS, The Board of Directors of the EDCAQMD has determined in the 2006 RACT SIP Update Analysis Staff Report that there are no Stationary Sources of VOC in the EDCAQMD in the CTG categories of Aerospace Coating, Automotive Coating (Assembly Plant), Large Appliance Coating, Magnet Wire Coating, Metal Coil, Container and Closure Coating, Metal Furniture Coating, Paper and Fabric Coating, Ship Coating, Wood Coating (Flat Wood Paneling), Wood Furniture, Natural Gas/Gasoline Plants, Refineries, Synthetic Organic Chemical Manufacturing, Tanks, Petroleum Dry Cleaning, Pharmaceutical Products, Polyester Resin Manufacturing, and Rubber Tires; and

WHEREAS, The Board of Directors of the EDCAQMD has determined in the 2006 RACT SIP Update Analysis that one (1) new prohibitory rule setting VOC RACT limits

on coating of Metal Parts and Products for existing non-Major VOC emission Sources in El Dorado County needs to be implemented no later than January 1, 2009; and

WHEREAS, the District has considered the relative cost effectiveness of the Metal Parts and Products control measure as well as other factors, as required by Health and Safety Code Section 40922, and made reasonable efforts to determine the direct costs expected to be incurred by regulated parties pursuant to Health and Safety Code Section 40703; and

WHEREAS, these proceedings were held in a public hearing and were properly noticed pursuant to Section 40725 of the Health and Safety Code of the State of California; with any evidence having been received concerning the proposed adoption of this Resolution and this Board having duly considered such evidence; and

WHEREAS, the negative declaration findings and the finding of RACT control measures to be adopted are categorically exempt from CEQA pursuant to Title 14, California Administrative Code, Section 15308, as an action by a regulatory agency for the protection of the environment.

NOW, THEREFORE, BE IT RESOLVED, that this Board approves and adopts this Resolution thereby approving the 2006 Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Update Analysis Staff Report and the findings

made therein, and directing staff to complete the specified rule adoption, and negative declarations to revise the State Implementation Plan.

BE IT FURTHER RESOLVED AND ORDERED that the Air Pollution Control Officer is hereby authorized and directed to submit this resolution as a revision to the State Implementation Plan, in the form required by the California Air Resources Board and the United States Environmental Protection Agency, on behalf of the El Dorado County Air Quality Management District.

PASSED AND ADOPTED by the Air Quality Management District Board of Directors of the County of El Dorado at a regular meeting of said Board, held on the _____ day of _____, 20_____, by the following vote of said Board:

Ayes:

ATTEST
Cindy Keck
Clerk of the Board of Supervisors

Noes:

Absent:

By _____
Deputy Clerk

Chairperson, AQMD Board of Directors

I CERTIFY THAT:
THE FOREGOING INSTRUMENT IS A CORRECT COPY OF THE ORIGINAL ON FILE IN THIS OFFICE

DATE _____

ATTEST : CINDY KECK, Clerk of the Board of Supervisors of the County of El Dorado, State of California.

By _____
Deputy Clerk

ATTACHMENT #2

2006 RACT SIP Update Analysis Staff Report

**EL DORADO COUNTY
AIR QUALITY MANAGEMENT DISTRICT**

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

DECEMBER 15, 2006

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INTRODUCTION

El Dorado County is located in northern California, bordering Sacramento County to 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 over 9,000 feet in the mountains of the Sierras. 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 has been designated as "serious" non-attainment for the 8-hour ozone National Ambient Air Quality Standard (NAAQS). 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 (NOx), 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) or Maximum Achievable Control Technology" (MACT) levels which are expected of new sources.

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 to Implement the 8-Hour Ozone NAAQS* (70 FR 71612, November 29, 2005) areas classified as moderate non-attainment or higher must submit a demonstration that their current rules fulfill 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 represent RACT for 8-hour ozone. Areas may rely on previous analyses written for 1-hour ozone plans and U.S. EPA guidance documents. The RACT SIP submittal is in addition to the area's 8-hour Ozone Attainment Demonstration Plan, which will also be a SIP submittal.

ACTION REQUESTED BY U.S. EPA

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

Part 1 Identify all District rules subject to the U.S. EPA Control Techniques Guidelines (CTG) source categories within the District and determine if they meet RACT standards.

Part 2 Identify all CTG categories for which there are no facilities in the District, and submit Negative Declarations stating that there are no such facilities.

Part 3 List District rules and their SIP approval status for all applicable RACT categories.

Part 4 Summarize the above processes that the District used to: (1) determine that the District regulations fulfill RACT, (2) determine Negative Declarations needed for certain CTG categories, and (3) determine which District rules need to be submitted to U.S. EPA as revision to the SIP.

The District was requested to prepare a complete RACT SIP update analysis, covering Major Sources, non-Major CTG Sources, and non-CTG Major Sources. In addition, the District is 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 would be March 15, 2009. Since El Dorado County has a full year ozone season, the required implementation date for the District will be January 1, 2009. Note that the implementation date for any source operating under a Title V permit, pursuant to 40 CFR Part 70, would be governed by the requirements of that permit. This staff report relates to the RACT SIP update analysis submittal.

ANALYSIS

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 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 SFNA to submit an 8-hour ozone attainment demonstration plan to U.S. EPA by June 15, 2007, as specified by federal requirements.

Part 1 – Identify all District rules subject to the U.S. EPA CTG source categories within the District and determine if they meet RACT standards.

This District analysis compared the current Prohibitory Rules (Regulation 2 in the District Rule Book) to current U.S. EPA guidance standards for emission control measure. The purpose of this work was to: (1) determine if the District had an adopted rule for the source category, (2) determine if the rule's control measures satisfied the requirements of the U.S. EPA's control measure standard, and (3) determine if a new rule will need to be adopted for existing emission sources. The standards compared were Control Techniques Guidelines (CTG) and Alternate Control Techniques (ACT) Guidance. The ultimate purpose of this study is the determination by the District of whether the District has existing adopted rules that meet or exceed the standards in the current CTGs and ACTs.

To determine if District rules fulfill RACT requirements, Staff used the following guidelines:

- District rules that have been SIP-approved by U.S. EPA are considered to meet RACT requirements because U.S. EPA evaluated the rules to determine if they fulfill RACT established by CTGs, (ACTs) and U.S. EPA guidelines and policies. Therefore, any EPA SIP-approved District rules are said to have met RACT requirements.
- As a non-attainment area for the California ozone standard, the District is required by California Health and Safety Code (CH&SC) Sections 40914(a)(2) and 40920.6(a) to implement "All Feasible Control Measures" (AFCM) and "Best Available Retrofit Control Technology" (BARCT). In general, AFCM and BARCT requirements are more stringent than those previously established by CTGs and ACTs. Therefore, District rules that implemented AFCM and BARCT are said to fulfill RACT requirements.
- All CTG emission source categories were compared against existing adopted District rules and a finding was made regarding whether the adopted rule met or exceeded the applicable CTG RACT requirements. All ACTs were evaluated to determine whether Major Sources exist in the source category and if so, whether or not a District rule satisfying ACT guidelines has been adopted.

Table A, provided as an Appendix to this report lists all U.S. EPA source categories requested, both Major and non-Major, and the corresponding CTGs and ACTs, with details of each category. All the adopted rules have been found to satisfactorily meet RACT requirements.

Table B contains the major source in the District and that the source meets RACT for all emission units.

Table C shows that there are rule categories listed in the April 4, 2006 U.S. EPA letter for which no sources currently exist in the District. The absence of sources of these categories was determined by Staff, based on a study of the District permit base, public notices, and personal knowledge (See Part 2, below which discusses Negative Declarations) Staff also noted that the District has new non-Major Sources in one CTG category (Metal Parts and Products) that has no rule at this time. The District RACT SIP submittal process will include the requirement that the appropriate rule be written, adopted and approved subsequent to this RACT SIP study, but no later than the El Dorado County RACT implementation date of January 1, 2009.

Table D provides an overview of adopted District Rules and amendments, and Applicable SIP Approval dates.

Major Sources:

The following Table B lists the Major Source that is currently in the District.

Table B - Major Sources – El Dorado Air Quality Management District					
Source	Source Category	Pollutant	Rule No.	Rule Title	Location / Comments
Sierra Pacific Industries (Title V)	Boilers, Steam Generators and Process Heaters	NO _x	232	Biomass Boilers	Camino
Sierra Pacific Industries (Title V)	Boilers, Steam Generators and Process Heaters	VOC	234	VOC RACT Rule-Sierra Pacific Industries	Camino

The Major Stationary Source, including Major non-CTG Sources have adopted District rules that satisfy RACT requirements.

Part 2 - Negative Declaration (Negative Declaration) for use with 8-hour Ozone Reasonably Available Control Technology (RACT) State Implementation Plan Certification

Background

Due to the designation of portions of El Dorado County as "moderate" or above non-attainment for ozone, Sections 182(b)(2) and 182(f) of the Federal CAA require the District to submit a revision to the State Implementation Plan (SIP) to implement RACT for each category of Volatile Organic Compound (VOC) or Nitrogen Oxide (NOx) sources covered by a CTG document and for any Major Stationary Source not covered by a CTG document. The Mountain Counties Air Basin portions of the District are part of the Sacramento Federal Ozone Non-Attainment Area (SFNA) which is designated as "serious" non-attainment for ozone.

RACT requires that all non-attainment areas classified as "moderate" or above have RACT in place for source categories covered by a Control Techniques Guideline (CTG) document and for Major Sources that are not subject to a CTG (i.e. a "Major non-CTG Source"). A "Major Source" of VOCs or NOx in El Dorado County is defined as an emission source having a potential to emit of 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 is required to submit Negative Declarations for all CTG categories for which there are no sources above the CTG recommended threshold, 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.

The Negative Declaration must go through the same public review requirements as any other SIP submittal.

Negative Declaration Findings and Staff Recommendations

The District Staff reviewed permit databases, SIC codes, other source data and the emission inventory for its Federal Clean Air Plan, and has determined that there are no sources for the CTG categories listed below in Table C.

Staff has determined that there are no existing sources of emissions in these eighteen (18) CTG categories and the Negative Declarations should be submitted to U.S. EPA for approval. Staff will submit these eighteen (18) Negative Declarations for public comment, and District Board consideration and approval. If approved by the District Board the Negative Declarations will be submitted to CARB for forwarding to U.S. EPA as requested revisions to the State Implementation Plan.

Table C District Negative Declaration Submittal Requirements		
	Rule Title	Pollutant
1	Aerospace Coating	VOC
2	Automotive Coating (Assembly Plant)	VOC
3	Large Appliance Coating	VOC
4	Magnet Wire Coating	VOC
5	Metal Coil, Container and Closure Coating	VOC
6	Metal Furniture Coating	VOC
7	Paper and Fabric Coating	VOC
8	Ship Coating	VOC
9	Wood Coating (Flat Wood Paneling)	VOC
10	Wood Furniture	VOC
11	Natural Gas/Gasoline Plants	VOC
12	Refineries	VOC
13	Synthetic Organic Chemical Manufacturing	VOC
14	Tanks	VOC
15	Petroleum Dry Cleaning	VOC
16	Pharmaceutical Products	VOC
17	Polyester Resin Manufacturing	VOC
18	Rubber Tires	VOC

Part 3 - SIP Status - Identify all District rules subject to the U.S. EPA CTG source categories within the District and determine if they meet RACT standards.

The current status of each of the District prohibitory rules that previously were adopted for CTG/ACT source categories was reviewed and is displayed in the following table. This SIP status study was necessary in order to determine which rules, if any, needed to be submitted or re-submitted for SIP approval by U.S. EPA.

Staff examined the adoption dates of the above rules, and the dates of the latest amendments, if any. Then the date of SIP approval was compared with the rule adoption histories.

Table D - District Rule History (VOC and NOx) and SIP Approval Status:

Table D lists the adoption history of seven (7) District rules for CTG categories and ACT categories at major sources, and their SIP approval status. They are listed by rule number. The right hand column indicates if the District must re-submit any existing rule that was amended after the latest date of SIP approval, in order to ensure that the review will be based upon the most current amendment of that rule. Staff recommends that these SIP submittals be found exempt from the California Environmental Quality Act (CEQA). The proposed submittals are exempt from CEQA as per Title 14, California Code of Regulations, Chapter 3, Article 19, Section 15308, Actions by Regulatory Agencies for the Protection of the Environment.

Table D - District Rule History (VOC and NOx) and SIP Approval Status							
Rule No.	Rule Title	Pollutant Controlled	CTG Source ?	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approval Required ?
224	Cutback and Emulsified Asphalt Paving Materials	VOC	Yes	9/16/91	6/6/94	8/21/95 - 60 FR 43383	N
225	Organic Solvent Cleaning and Degreasing Operations	VOC	Yes	9/27/94	Not Amended	8/21/95 - 60 FR 43383	N
231	Graphic Arts Operations	VOC	Yes	9/27/94	Not Amended	7/11/97 62 FR 37136	N
232	Biomass Boilers	NOx	No	10/18/94	9/25/01	10/14/03 - 68 FR 59121	N
234	VOC RACT Rule-Sierra Pacific Industries	VOC	No	4/25/95	Not Amended	9/12/95 - 60 FR 47273	N
238	Gasoline Transfer and Dispensing	VOC	Yes	3/27/01	Not Amended	8/27/01 - 66 FR 44974	N
244	Organic Liquid Loading and Transport Vessels	VOC	Yes	3/27/01	9/25/01	7/8/02 - 67 FR 45066	N

Part 4 – Summary and Conclusions

New RACT Rules to Be Adopted - Details of the process Staff used to evaluate the Applicable SIP status of the District's rules that satisfy Major Source RACT requirements are described in **Part 1**, above. The Staff comparison of all current District rules to the standards of applicable CTG's and ACT's found that the District has adopted rules corresponding to RACT source categories and that satisfy RACT requirements. One CTG category, Metal Parts and Products, have non-Major emission source(s), but no District Rule has been adopted. Staff recommends that the Board direct the development and adoption of the rule to limit VOC emissions from the coating of metal parts and products. Although there are no Major Sources in this source category, there are non-Major Sources of VOC that would be subject to the new rule establishing RACT requirements. The rules should be implemented by January 1, 2009, and should be adopted as a revision to the SIP and submitted to U.S. EPA.

Negative Declarations - (Part 2) Based on Staff review of District sources, the Negative Declaration of no existing Major Stationary VOC Sources may be made for eighteen (18) additional VOC RACT source categories. In addition, the Staff analysis found that there were no Major Stationary Sources, including Major non-CTG Sources, for which District rules satisfying RACT had not been adopted. Staff recommends that the District Board make the declaration that no existing Stationary Sources exist for VOC in El Dorado County in the eighteen (18) 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, Section 15308, Actions by Regulatory Agencies for the Protection of the Environment.

SIP Status – (Part 3) Rule adoption, amendment, and SIP approval history for District prohibitory rules was reviewed and analyzed. The seven (7) rules are already SIP-approved rules.

APPENDIX

**Table A -
Rule Categories as Listed in U.S. EPA Letter to CARB, 4/4/06**

List of CTGS and RACT Analysis

Category	EPA Documents	
General	CTGs	RACT analysis
Coating & Solvents		
Surface Coating	No CTG or major source	Not applicable
Adhesives and Sealants	No CTG or major source	Not applicable
Aerospace	<p>(P4) Control of VOC Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations CTG & MACT (See 59 FR 29216, 6/6/1994); CTG (Final), EPA-453/R-97-004, 12/97). http://www.epa.gov/ttn/oarpg/t1/memoranda/ctg.pdf</p>	No sources which meet CTG applicability
Architectural Coatings	No CTG or major source	Not applicable
Automobile Coating	<p>(#3) 1. Control of Volatile Organic Emissions from Existing Stationary Sources - Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 5/77, NTIS PB-272-445), CTG. http://www.epa.gov/ttn/chief/old/ap42/ch04/s0227/reference/ref_02c04s0227_Jan1995.pdf</p>	No sources which meet CTG applicability (objects surface coated in automotive and light duty truck assembly plants)
Graphic Arts	<p>(#19) 1. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VIII: Graphic Arts - Rotogravure and Flexography (EPA-450/2-78-033, 12/78, NTIS PB 292-490), CTG. http://www.epa.gov/ttn/chief/old/ap42/ch04/s091/reference/ref_03c04s091_1995.pdf</p>	Rule 231 Graphic Arts Operations requires either low-VOC inks or add-on controls with a control efficiency of 95% and a collection efficiency of 70%. The CTG presents either water-borne or high solids inks, or add-on controls. The rule meets RACT.
Large Appliances	<p>(#9) Control of Volatile Organic Emissions from Existing Stationary Sources, Volume V: Surface Coating of Large Appliances, EPA-450/2-77-034, NTIS PB-278-259), CTG. http://www.epa.gov/ttn/chief/old/ap42/ch04/s0224/reference/ref_02c04s0224_1995.pdf</p>	No sources which meet CTG applicability
Magnet Wire	<p>(#8) Control of Volatile Organic Emissions from Existing Stationary Sources, Volume IV: Surface Coating of Insulation of Magnet Wire, (EPA-450/2-77-033, 12/77, NTIS PB-278-258), CTG. http://www.epa.gov/ttn/chief/old/ap42/ch04/s0223/reference/ref_01c04s0223_1995.pdf</p>	No sources which meet CTG applicability

Metal Coil, Container, & Closure	See automobile coating.	No sources which meet CTG applicability
Metal Furniture	(#7) Control of Volatile Organic Emissions from Existing Stationary Sources, Volume III: Surface Coating of Metal Furniture (EPA-450/2-77-032, 12/77, NTIS PB-278-257), CTG http://www.epa.gov/ttn/chief/old/ap42/ch04/s0224/reference/ref_01c04s0224_1995.pdf .	No sources which meet CTG applicability
Metal Parts & Products	(#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, 6/78, NTIS PB-286-157), CTG. http://www.epa.gov/ttn/chief/old/ap42/ch04/s0224/reference/ref_03c04s0224_1995.pdf	Existing Sources meet CTG applicability-RACT rule to be promulgated.
Paper & Fabric	See automobile coating.	No sources which meet CTG applicability
Plastic Parts	No CTG or major source	Not applicable
Ships	(P3) (A16) 1. ACT Document: Surface Coating Operations at Shipbuilding and Ship Repair Facilities (EPA-453/R-94-032, 4/94, NTIS PB-94-181-864). The ACT was superseded by the Shipbuilding CTG which was issued in 1996 http://www.epa.gov/ttn/oarpg/t1/memoranda/ship-1.zip http://www.epa.gov/ttn/oarpg/t1/memoranda/ship-2.zip (P3) 2. CTG, see 61 FR 44050, 8/27/96. FR notice: http://www.epa.gov/ttn/oarpg/t1/memoranda/shipctg.zip	No sources which meet CTG applicability
Solvent Cleaning	(#4) 1. Control of Volatile Organic Emissions from Solvent Metal Cleaning, (EPA-450/2-77-022, 11/77, NTIS PB-274-557), CTG. http://www.epa.gov/ttn/chief/old/ap42/ch04/s06/reference/ref_02c04s06_1995.pdf	Rule 225-Organic Solvent Cleaning and Degreasing requires covers, draining facilities and work practices that minimize solvent evaporation or an emission control system which has 85% control efficiency. The CTG presents similar machine design specifications, alternative control devices and work practices. The rule meets RACT.
Traffic Markings	No CTG or major source	Not applicable
Wood Coating: Factory Surface of Flat Wood Paneling	(#15) Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VII: Factory Surface of Flat Wood Paneling (EPA-450/2-78-032, 6/78, NTIS PB 286-199), CTG. http://www.epa.gov/ttn/chief/old/ap42/ch04/s0225/reference/ref_01c04s0225_1995.pdf	No sources which meet CTG applicability

Wood Furniture	(P2) Control of VOC Emissions from Wood Furniture Manufacturing Operations CTG-MACT draft MACT our 5-94; Final CTG, EPA-453/R-96-007, 4/96, NTIS PB-96-178-769), Also see 61 FR 25223 and 61 FR 50823, 9/27/96.	No sources which meet CTG applicability (potential emissions of greater than 25 tons/year)
Petroleum	CTG	
Gasoline Plants	(#10) Control of Volatile Organic Emissions from Bulk Gasoline Plants (EPA-450/2-77-035, 12/77, NTIS PB-276-722), CTG.	Rule 244-Organic Liquid Loading and Transport Vessels 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 1000 gallons transferred. The CTG presents submerged filling and vapor balance system. This rule meets RACT.
Natural Gas/Gasoline	(#26) Control of VOC Equipment Leaks from Natural Gas/Gasoline Processing Plants (EPA-450/2-83-007, 12/83, NTIS PB-84-161-520), CTG.	No sources which meet CTG applicability
Refineries	(#5) 1. Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds, (EPA-450/2-77-025, 10/77, NTIS PB-275-662), CTG. (#16) 2. Control of VOC Leaks from Petroleum Refinery Equipment (EPA-450/2-78-036, 6/78, NTIS PB-286-158), CTG.	No sources which meet CTG applicability
Service Stations	(#1) 1. Design Criteria for Stage I Vapor Control Systems - Gasoline Service Stations, (11/75), CTG.	Rule 238-Gasoline Transferring and Dispensing requires a CARB certified vapor recovery system with a recovery efficiency of 95% or 0.15 lb gasoline vapor emitted per 1000 gallons. The CTG requires 90% control. This rule meets RACT.
Synthetic Organic Chemical	(#28) 1. Control of VOC Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry (EPA-450/3-84-015, 12/84, NTIS PB-85-164-275), CTG. (P1) 2. Control of VOC Emissions from Reactor Processes and Distillation Operations in SOCOMI (EPA-450/4-91-031, 11/15/93, NTIS PB-92-180-009), CTG.	No sources which meet CTG applicability
Tanks	(#11) 1. Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed Roof Tanks (EPA-450/2-77-036, 12/77, NTIS PB-276-749), CTG. (#20) 2. Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks (EPA-450-2/78-047, 12/78, NTIS PB-290-579), CTG. www.epa.gov/clariton/clhtml/pubtitle.html	No sources which meet CTG applicability (vessels larger than 150,000 liters)

Tank Trucks	(#6) 1. Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals (EPA-450/2-77-026, 12/77, NTIS PB-275-060), CTG. . (#22) 2. Control of VOC Leaks from Gasoline Tank Trucks and Vapor Collection Systems (EPA-450/2-78-051, 12/78, NTIS PB-290-568), CTG. .	Rule 244-Organic Liquid Loading and Transport Vessels 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 1000 gallons transferred. The CTG presents submerged filling and vapor balance system. This rule meets RACT.
Combustion	ACT	
Boilers, Steam Generators, Process Heaters (NOx)	Major source: Sierra Pacific Industries (N3) 1. ACT Document -- NOx Emissions from Process Heaters (Revised) (EPA-453/R-93-034, 9/93). http://www.epa.gov/ttn/catc/dir1/procheat.pdf (N5) 2. ACT Document -- NOx Emissions from Utility Boilers (EPA-453/R-94-023, 3/94). http://www.epa.gov/ttn/chief/old/ap42/ch01/s01/reference/ref27_c01s01_1998.pdf (N7) 3. ACT Document -- NOx Emissions from Industrial/Commercial/Institutional (ICI) Boilers (EPA-453/R-94-022, 3/94). http://www.epa.gov/ttn/catc/dir1/icboiler.pdf	Rule 232-Biomass Boilers requires a NO _x limit of 115 ppmv corrected to 12% CO ₂ or 50% reduction efficiency. This limit is identical to PCAPCD Rule 233 for similar type specialized industrial boilers. This rule meets RACT.
Boilers, Steam Generators, Process Heaters (VOC)	Major source: Sierra Pacific Industries	Rule 234-VOC RACT Rule-Sierra Pacific Industries requires a VOC limit of 150 ppmv for boilers exceeding the calendar year average of 50,000 lb/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.
Cement Kilns	No CTG or major source	Not applicable
Gas Turbines	No CTG or major source	Not applicable
Glass Furnaces	No CTG or major source	Not applicable
Internal Combustion Engines	No CTG or major source	Not applicable
Iron and Steel	No CTG or major source	Not applicable
Municipal Waste Combustion	No CTG or major source	Not applicable
NOx Rules	No CTG or major source	Not applicable
Other	CTG	

Cutback Asphalt	(#12) Control of VOC from Use of Cutback Asphalt (EPA-450/2-77-037, NTIS PB 278-185), CTG. http://www.epa.gov/ttn/chief/old/ap42/ch04/s05/reference/ref_03c04s05_1995.pdf	Rule 224-Cutback and Emulsified Asphalt Paving Materials 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.
Bakeries	No CTG or major source	Not applicable
Dry Cleaning	(#24) Control of VOC Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009 9/82, NTIS PB-83-124-875), CTG	No sources which meet CTG applicability (facility which consumes 123,000 liters/year solvent or more)
Fertilizer	No CTG or major source	Not applicable
Ink and Paint Manufacture	No CTG or major source	Not applicable
Leather Tanning	No CTG or major source	Not applicable
Nitric and Adipic Acid	No CTG or major source	Not applicable
Pesticides	No CTG or major source	Not applicable
Pharmaceutical Products	(#17) Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products (EPA-450/2-78-029, 1278, NTIS PB-290-580), CTG. http://www.epa.gov/ttn/chief/old/ap42/ch06/s10/reference/ref_01c06s10_1995.pdf	No sources which meet CTG applicability
Polyester Resin	(#25) 1. Control of VOC Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins (EPA-450/3-83-008, 11/83, NTIS PB-84-134-600), CTG. http://www.epa.gov/clariton/clhtml/pubtitle.html (#27) 2. Control of VOC Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment (EPA-450/3-83-006, 3/84, NTIS PB-84-189-372), CTG. http://www.epa.gov/clariton/clhtml/pubtitle.html	No sources which meet CTG applicability
Rubber Tires	(#18) Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires (EPA-450/2-78-030, 12/78, NTIS PB-290-557), CTG. www.epa.gov/clariton/clhtml/pubtitle.html	No sources which meet CTG applicability
Sulfuric Acid	No CTG or major source	Not applicable
Wastewater	No CTG or major source	Not applicable

ATTACHMENT #3

Notice of CEQA Exemption

Notice of Exemption

Form C

To: Office of Planning and Research
PO Box 3044
1400 Tenth Street, Room 121
Sacramento, CA 95812-3044

From: (Public Agency)
Air Quality Management District
2850 Fairlane Court
Placerville, CA 95667

County Clerk
 County of El Dorado
330 Fair Lane
Placerville, CA 95667

Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Update Analysis

Project Title

El Dorado County Air Quality Management District

Project Location – Specific **(El Dorado County)**

El Dorado County Air Quality Management District

Project Description:

Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Update Analysis and SIP Revision determines whether EDCAQMD prohibitory rules meet RACT as required by the US EPA

El Dorado County Air Quality Management District

Name of Public Agency Approving Project

El Dorado County Air Quality Management District

530-621-6662

Name of Person or Agency Carrying Out Project

Telephone Number

Exempt Status:

- Ministerial (Sections 210800(b)(1); 15268)
- Declared Emergency (Sections 21080(b)(3); 15269(a))
- Emergency Project (Sections 21080(b)(4); 15269(b)(c))
- Categorical Exemption. State type and section number: Section 15308
- Statutory Exemption. State code number: _____

Reasons why project is exempt:

RACT SIP Update Analysis and SIP Revision is an action by a regulatory agency for protection of the environment.

Lead Agency
Contact Person: M McTaggart **Area Code/ Telephone/Extension:** (530) 621-5306

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature (Public Agency) _____
Date _____
Title

- Signed by Lead Agency Date received for filing at OPR:
- Signed by Applicant

EL DORADO
COUNTY



ENVIRONMENTAL
MANAGEMENT
DEPARTMENT

Environmental
Health Division

Air Quality
Management
District

Solid Waste &
Hazardous
Materials
Divisions

Vector Control



PLACERVILLE
OFFICE

2850 Fairlane Ct.
Building C
Placerville, CA 95667

Ph. 530.621.5300
Fax. 530.642.1531
Fax. 530.626.7130

SOUTH LAKE
TAHOE OFFICE

368 Lake Tahoe Blvd.
Ste 303
South Lake Tahoe, CA
96150

Ph. 530.573.3450
Fax. 530.542.3364

COUNTY OF EL DORADO

ENVIRONMENTAL MANAGEMENT DEPARTMENT

December 15, 2006

Andrew Steckel
Chief, Rulemaking Office
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Subject: Responses to EPA letter of November 28, 2006 concerning El Dorado County Air Quality Management District (EDC AQMD) 2006 RACT SIP Update Analysis Staff Report

Dear Mr. Steckel:

Thank you for your suggestions on the EDC AQMD 2006 RACT SIP Update Analysis Staff Report in your letter of November 28, 2006. Responses to each of your comments follow the comment and updates have been made in the Staff Report.

Rule Submittals and Comments

1. Page 7 of the staff report states the District has new non-major emission sources under the CTG for Metal Parts and Products, but has no rule at this time. A RACT rule should be developed and submitted for SIP approval as soon as possible as EPA cannot consider the RACT SIP analysis complete without the required rule.

Response: The RACT rule for Miscellaneous Metal Parts and Products will be promulgated as expeditiously as possible.

2. EPA cross-matched District rules and the negative declarations in Table C of the staff report against the list of CTGs. The staff report does not appear to address the following CTGs. A negative declaration should be submitted if the District has no sources in the following categories. However, if the District has sources in these categories, then the staff report should be clarified to identify which District rules cover the CTGs below.

- a. Control of Volatile Organic Emissions from Bulk Gasoline Plants EPA-450/2-77-035, 12/77 (Appendix A page 6)
- b. Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed Roof Tanks (EPA-450/2-77-036, 12/77, (Appendix A page 7)
- c. Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks (EPA-450-2/78-047, 12/78, (Appendix A page 7)

Response: These CTGs were originally included in the Natural Gas/Gasoline plant category. However they will be identified separately. Item a. is addressed by Rule 244-Organic Liquid Loading and Transport Vessels, and El Dorado County does not have any sources that meet the applicability of items b. and c.

3. The staff report asserts various District rules meet RACT. Particularly where the last RACT determination for specific source categories occurred many years ago, the report should reflect some analysis that RACT has not subsequently changed. For example, Rules 232 and 234 apply to the District's only major source, Sierra Pacific Industries, and were last amended

in 2001 and 1995 respectively. The analysis should include additional discussion on how the District concluded these rules still represent current RACT. For example, is CARB's 1994 analysis still appropriate for Rule 234: http://www.arb.ca.gov/pm/pmmeasures/ceffect/reports/pcapcd_229_report.pdf

Response: The above report is for a MDF facility in Placer County and does not address the type of equipment at Sierra Pacific Industries Camino plant. The analysis performed by Radian for EPA for the Michigan-California Lumber Company (Sierra Pacific Industries predecessor) in December 1993 is still appropriate. Rule 232 is identical to Placer County Rule 233 and meets RACT.

At a minimum, we believe a short comparison of EDAQMD controls versus rules in two or three other similar air districts is appropriate for each rule listed in Enclosure (1). The District should also certify it is not aware of any significant changes in technology that affect the original RACT determination.

Response: The following table addresses each of the categories listed in Enclosure (1) of your letter:

District Rule/Title	Date Adopted/ Amended	Rule SIP FR action	ECAQMD Analysis Staff Report Page #	Response
Rule 224- Cutback and Emulsified Asphalt Paving Material	9/16/1991/ 9/27/1994	8/21/1995 60 FR 43383	p11; Several Great Lake States have adopted summertime restrictions on cutback asphalt. SCAQMD plans to investigate the feasibility of the Great Lake States' rule.	<i>Rule 224 meets RACT from the current CTG.</i>
Rule 225- Organic Solvent Cleaning and Degreasing Operations	9/27/1994	8/21/1995 60 FR 43383	p11; Sacramento AQMD adopted more stringent controls in 2002	<i>Rule 225 meets RACT from the current CTG</i>
Rule 231- Graphic Arts	9/27/1994	7/11/1997 62 FR 37136	p11; EDAQMD rule applies to facilities emitting ≥ 660 pounds/month. SM 431 applies to facilities emitting >60 pounds/month. Although not applicable to the current analysis, EPA's recently issued graphic arts CTG suggests an applicability threshold of >450 pounds/month.	<i>Rule 231 meets RACT from the current CTG. The applicability threshold from the new CTG will be evaluated in the future.</i>
Rule 232- Biomass Boilers	10/18/1994 / 9/25/2001	10/14/2003 68 FR 59121	p11; Compare against other District's biomass/solid fuel boiler NOx limits.	<i>PCAPCD Rule 233 has the same NOx limits.</i>

Rule 234-VOC RACT Rule – Sierra Pacific Industries	4/25/1995	9/12/1995 60 FR 47273	p11; Is CARB's 1994 analysis still appropriate for Rule 234? : http://www.arb.ca.gov/pm/pmmeasures/ceffect/reports/pcapcd_229_report.pdf	<i>The listed analysis is for a Placer County MDF facility. The analysis for SPI is "RACT Determination for Michigan-California Lumber Company Technical Support Documentation done by Radian for EPA Region IX- December 1993. This analysis is still appropriate.</i>
Rule 237-Wood Products Coating Operations	6/27/1995	7/18/1996 61 FR 37390	p11 EDAQMD rule applies to facilities applying >20gallons/mth. SM 463 applies at >55 gallons/year	<i>EDCAQMD has no sources which meet the CTG applicability threshold of 25 tons/year of potential VOC emissions.</i>

4. Tables D-1 and D-2 list Rule 216, Organic Solvents, amended 1/24/1985 as not requiring a new SIP approval. Rule 216 is SIP approved under the Mountain Counties Air Basin. That version of Rule 216 is titled "Organic Compounds" as opposed to "Organic Solvents" and uses vapor pressure to help define a VOC. The use of vapor pressure to define a VOC conflicts with EPA's definition of VOCs in 40 CFR 51.100(s). If Rule 216 is needed for RACT, it should be updated and adopted for El Dorado AQMD.

Response: Rule 216-Organic Compounds is not needed for RACT and will be deleted from the analysis.

5. Table D-3 identified that Rule 244, Organic Liquid Loading and Transport Vessels, was amended but had not been submitted for SIP approval. The September 25, 2001 version of Rule 244 was approved into the SIP on 7/8/2002 (67 FR 45066), so it does not need to be submitted again.

Response: Thank you for updating the SIP approval date on Rule 244-Organic Liquid Loading and Transport Vessels. The RACT SIP Staff Report has been modified accordingly.

6. Although architectural coatings is not a CTG category, 40 CFR 59 Subpart D contains EPA's national limits for the VOC content of architectural coatings. El Dorado's limit for traffic coatings in Rule 215 is 250 g/l. This is less stringent than the 150 g/l limit in the national rule. Rule 215 should be amended.

Response: The change in traffic coatings VOC limit will be addressed when Rule 215-Architectural Coatings is opened for amendment. There are no CTGs or major sources so this is not a RACT issue.

7. California State Law SB 700 removed the permit exemption for agricultural internal combustion engines. El Dorado's Rule 233, Stationary Internal Combustion Engines, amended June 6, 2006 exempts agricultural engines. Rule 233 should be amended to conform to SB 700.

Response: The requirements of SB 700 will be addressed when Rule 233-Stationary Internal Combustion Engines is opened for amendment. There are no CTGs or major sources which have stationary internal combustion engines so this is not a RACT issue.

Future CTGs

8. To assist the District with their planning efforts, we note that on October 5, 2006, EPA finalized four new CTGs covering flexible packaging printing materials, lithographic printing materials, letterpress printing materials, industrial cleaning solvents and flat wood paneling coatings. While the current RACT SIP analysis does not need to address these new CTGs, the Notice points out that States (and local air districts) should submit their SIP revisions within one year of the date that the CTGs are finalized. The CTGs are available at: http://www.epa.gov/ttn/naaqs/ozone/ctg_act/index.htm. Additional CTGs are expected to be issued in 2007 and 2008 (71 FR 28320 May 16, 2006). Further guidance will be provided once we receive it.

Response: Thank you for the update on new CTGs. The RACT SIP analysis will be updated after further guidance.

Thank you for your assistance on the EDCAQMD RACT SIP. If you have any questions regarding the 2006 RACT SIP analysis, please contact me at (530) 621-5306 or Carolyn Craig at (530) 621-6649.

Sincerely,



Marcella McTaggart
Air Pollution Control Officer
El Dorado County Air Quality Management District