

**EL DORADO COUNTY AIR QUALITY MANAGEMENT DISTRICT**  
**AGENDA ITEM TRANSMITTAL**  
**Meeting of December 5, 2006**

**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:**

**CAO USE ONLY:**

**CONTACT:** Gerri Silva/Marcella McTaggart

**DATE:** 11/8/2006

**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 adopt 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:**

*held hearing; adopt resolution.*

*Laure A. Gile*  
*11/22/06*

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 *JS*

Total Funding                      \$0.00

County Counsel *JS*

Change in Net County Cost                      \$0.00

Other

**\*Explain**

**BOARD ACTIONS:**

Vote: Unanimous                      Or

Ayes:

Noes:

Abstentions:

Absent:

Rev. 04/05

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

Date:                                     

Attest: Cindy Keck, Board of Supervisors Clerk

By:

**EL DORADO  
COUNTY**



**ENVIRONMENTAL  
MANAGEMENT  
DEPARTMENT**

*Environmental  
Health Division*

*Air Quality  
Management  
District*

*Solid Waste &  
Hazardous  
Materials  
Divisions*

*Vector Control*



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# COUNTY OF EL DORADO

## ENVIRONMENTAL MANAGEMENT DEPARTMENT

November 17, 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 adopt 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 Control Techniques Guidelines (CTG) 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

- Nine (9) EDCAQMD rules that satisfy RACT requirements have already been submitted to EPA and incorporated into the SIP

One (1) recently amended EDCAQMD rule needs to be submitted to EPA as revision to the SIP:

245     Organic Liquid Loading and Transport Vessels

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 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 fifteen (15) 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. The purpose of the Board Public Hearing is to consider public comments regarding the 2006 RACT SIP Update Analysis Report. No other public meetings were held. No public comments were 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

**CONTRACT ROUTING SHEET**Date Prepared: 10/10/2006Need Date: 10/24/2006**PROCESSING DEPARTMENT:**Department: Environmental MgmtDept. Contact: Kerri WilliamsPhone #: 5309

Department

Head Signature: [Signature]**CONTRACTOR:**Name: NA

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

**CONTRACTING DEPARTMENT:** AIR-Environmental Management-CHARGE TO 422100Service Requested: Review Resolution for Approval of RACT SIP Update AnalysisContract Term: NAContract/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: 10/13/06By: [Signature]Approved: ☐ Disapproved: ☐ Date: \_\_\_\_\_

By: \_\_\_\_\_

See suggested changes pgs 1, 2 + 3No need to re-submit**RISK MANAGEMENT:** (All contracts and MOU's except boilerplate grant funding agreements)Approved: ☒ Disapproved: ☐ Date: 10/16/06By: [Signature]Approved: ☐ Disapproved: ☐ Date: \_\_\_\_\_

By: \_\_\_\_\_

OCT 16 2006

**OTHER APPROVAL:** (Specify department(s) participating or directly affected by this contract).

Departments:

Approved: ☐ Disapproved: ☐ Date: \_\_\_\_\_

By: \_\_\_\_\_

Approved: ☐ Disapproved: ☐ Date: \_\_\_\_\_

By: \_\_\_\_\_

EL DORADO COUNTY  
2006 OCT 11 AM 10:52Changes made  
CWC 10/10/06

Michael J Ciccozzi/PV/EDC  
11/20/2006 09:17 AM

To Carolyn A Craig/PV/EDC@TCP  
cc  
bcc  
Subject Re: Fw: Attached is a letter of comment from EPA after we adopted RACTSIP

Good morning Carolyn,  
I have reviewed the new and improved resolution. It looks good. thanks, mike  
Carolyn A Craig/PV/EDC

Carolyn A Craig/PV/EDC  
11/17/2006 03:58 PM

To Michael J Ciccozzi/PV/EDC@TCP  
cc  
Subject Fw: Attached is a letter of comment from EPA after we adopted RACTSIP

Mike-

Here is the EPA comment letter and a copy of the revisions I made to the resolution. The changes are detailed in red. Let me know if you have any objections, especially to the change in the last paragraph. Also attached is a scanned copy of your original review. Thanks for your quick review of this.



Agenda\_RACT SIP NEG DEC-Mike.doc Agenda\_RACT\_SIP Counsel Route.pdf

Carolyn A. Craig  
Air Quality Engineer  
El Dorado County Air Quality Management District  
(530) 621-6649

----- Forwarded by Carolyn A Craig/PV/EDC on 11/17/2006 03:31 PM -----



"John Finnell"  
<jfinnell@placer.ca.gov>  
11/16/2006 11:12 AM

To "Aleta Kennard" <akennard@airquality.org>, "BRIAN KREBS" <BKREBS@airquality.org>, "Jim Jester" <JJESTER@airquality.org>, "KEVIN J. WILLIAMS" <kjwilliams@airquality.org>, "Carolyn Craig" <carolyn.craig@co.el-dorado.ca.us>, "Steve McKinney" <steven.mckinney@co.el-dorado.ca.us>, "Dave Valler" <dvaller@co.yuba.ca.us>, "Matt Baldwin" <mbaldwin@co.yuba.ca.us>, "Matt Jones" <mjones@ysaqmd.org>, "Paul Hensleigh (E-mail)" <phensleigh@ysaqmd.org>, "Rene Toledo" <rtoledo@ysaqmd.org>

cc  
Subject Attached is a letter of comment from EPA after we adopted RACT SIP

Hi,

FYI - I mentioned this  
be corrected at our

meeting yesterday. Minor comments  
Board Meeting.

John Finnell  
Sr. Air Pollution  
Placer County Air  
3091 County Road  
Auburn, CA 95602  
(530) 745-2371

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PCAPCD RACT SIP analysis.pdf

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## **ATTACHMENT #1:**

Resolution: Approval of the 2006 RACT SIP Update Analysis





**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 (NOx) Reasonably Available Control Technology (RACT) rules covering all Major Stationary Sources of VOC and NOx; and

**WHEREAS,** The Board of Directors of the EDCAQMD has determined that the following prohibitory rule shall be submitted to U.S. EPA for RACT State Implementation (SIP) approval:

Rule 244      Organic Liquid Loading and Transport Vessels

**WHEREAS,** The Board of Directors of the EDCAQMD has determined that the submittal of the above rule is necessary to comply with requirements of California Health and Safety Code Sections 40001 and 40910, and Sections 110(a)(2), 110(f) and 182(b)(2) of the FCAAA; 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, 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), Natural Gas/Gasoline Plants, Refineries, Synthetic Organic Chemical Manufacturing, 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 the EDCAQMD has adopted rules meeting RACT which cover all existing Major Stationary Sources of VOC or NOx in the District; 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 adopted and submitted for RACT SIP approval 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, negative declarations, and rule submissions 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:

Noes:

Absent:

Absent:

By \_\_\_\_\_  
Deputy Clerk

\_\_\_\_\_  
Chairperson, AQMD Board of Directors

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**

**NOVEMBER 17, 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 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 (NO<sub>x</sub>), 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 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 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. CARB's 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 <sub>x</sub>	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 fifteen (15) CTG categories and the Negative Declarations should be submitted to U.S. EPA for approval. Staff will submit these fifteen (15) 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	Large Appliance Coating	VOC
3	Magnet Wire Coating	VOC
4	Metal Coil, Container and Closure Coating	VOC
5	Metal Furniture Coating	VOC
6	Paper and Fabric Coating	VOC
7	Ship Coating	VOC
8	Wood Coating (Flat Wood Paneling)	VOC
9	Natural Gas/Gasoline Plants	VOC
10	Refineries	VOC
11	Synthetic Organic Chemical Manufacturing	VOC
12	Petroleum Dry Cleaning	VOC
13	Pharmaceutical Products	VOC
14	Polyester Resin Manufacturing	VOC
15	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 tables. 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. The following lists the SIP status categories that were examined:

- a. Rules that were submitted and approved for SIP.
- b. Rules that were submitted and approved for SIP and that must be re-submitted for approval because of amendments that post-dated the SIP approval.
- c. Rules that have not yet been submitted for SIP approval.
- d. Rules that were submitted for SIP approval and which are awaiting approval. (None were in this category).

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-1 - District Rule History (VOC and NOx) and SIP Approval Status:**

Table D-1 lists the adoption history of ten (10) 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-1 - 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 ?
216	Organic Solvents	VOC	Yes	1979		1/24/85 - 50 FR 3338	N
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
230	Automotive Refinishing Operations	VOC	Yes	9/27/94	Not Amended	4/30/96 - 61 FR 18962	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
237	Wood Products Coating Operations	VOC	Yes		Not Amended	4/30/96 - 61 FR 18962	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 45067	Y

**District Rules Which Were SIP- Approved and Do Not Require Re-Submittal:**

Table D-2 lists rules that were submitted for SIP after their latest amendment date and approved. These nine (9) rules have been incorporated into the SIP and will not require resubmittal for SIP at this time.

Table D-2 - District Rules Which Were SIP- Approved and Do <u>Not</u> Require Re-Submittal							
Rule No.	Rule Title	Pollutant Controlled	CTG Source ?	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approval Required ?
216	Organic Solvents	VOC	Yes	1979	1/24/85	1/24/85 - 50 FR	N



Table D-2 - District Rules Which Were SIP- Approved and Do <u>Not</u> Require Re-Submittal							
Rule No.	Rule Title	Pollutant Controlled	CTG Source ?	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approval Required ?
						3338	
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
230	Automotive Refinishing Operations	VOC	Yes	9/27/94	Not Amended	4/30/96 - 61 FR 18962	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
237	Wood Products Coating Operations	VOC	Yes	6/27/95	Not Amended	4/30/96 - 61 FR 18962	N
238	Gasoline Transfer and Dispensing	VOC	Yes	3/27/01	Not Amended	8/27/01 - 66 FR 44974	N

**District Rules Which Were SIP-Approved and Now Require Re-Submittal Because of Amendments:**

Table D-3 lists the one (1) adopted District rule that was approved for SIP previously, and that must now be re-submitted for SIP because of amendments that post-dated the U.S. EPA's SIP approval.

Table D-3 - District Rules Which Were SIP-Approved and Require Re-Submittal Because of Recent Amendments							
Rule No.	Rule Title	Pollutant Controlled	CTG Source?	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approval Required ?
244	Organic Liquid Loading and Transport Vessels	VOC	Yes	3/27/01	9/25/01	7/8/02 - 67 FR 45067	Y

#### **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 fifteen (15) 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 fifteen (15) 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. Nine (9) SIP-approved rules do not require re-submittal for SIP status. One (1) previously SIP approved rule must be re-submitted because of amendments that post-dated the original approval. Staff recommends that the District Board direct and approve the submittal of the specified rules, previously adopted, to the U.S. EPA as revisions to the SIP.

## APPENDIX

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

## List of EPA Documents Which Help Establish RACT

Category	EPA Documents	
General	CTGs	<b>ACTs / other documents to help establish RACT at Major sources</b>
Batch Processes		<p>(A12) ACT Document Control of VOC Emissions from Batch Processes (EPA-453/R-93-017 or EPA-453/R-93-020 2/94).  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/batctg1.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/batctg1.zip</a>  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/batctg2.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/batctg2.zip</a>  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/batctg3.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/batctg3.zip</a>  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/batctg4.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/batctg4.zip</a>  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/batctg5.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/batctg5.zip</a></p>
NOx Sources		<p>1. Guideline for Determining the Applicability of Nitrogen Oxides Requirements Under Section 182(f), EPA, 12/93.  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/sec182f.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/sec182f.pdf</a>  2. Summary of NOx Control Technologies and their Availability and Extent of Application (EPA-450/3-92-004), 2/92.  <a href="http://www.epa.gov/clariton/clhtml/pubtitle.html">http://www.epa.gov/clariton/clhtml/pubtitle.html</a> OR  <a href="http://nepis.epa.gov/pubtitle.htm">http://nepis.epa.gov/pubtitle.htm</a>  3. Control Techniques for Nitrogen Oxides Emissions from Stationary Sources - Second Edition (EPA-450-1-78-001), 1/78  <a href="http://www.epa.gov/ttn/chief/old/ap42/ch01/s01/reference/ef_10c01s01_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch01/s01/reference/ef_10c01s01_1995.pdf</a></p>
RACM & RACT		<p>Beyond VOC RACT CTG Requirements (EPA-453/R-95-010, 4/95, NTIS PB-95-239-497), CTG  <a href="http://www.epa.gov/ttn/catc/dir1/byndract.pdf">http://www.epa.gov/ttn/catc/dir1/byndract.pdf</a></p>
Stationary VOC Sources		<p>(#13) 1. Control Techniques for Volatile Organic Emissions from Stationary Sources (EPA-450/2-78-022, 5/78, Group II, NTIS PB-284-804), CTG. Does not define RACT for any particular source.  <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s091/reference/ref_13c04s091_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s091/reference/ref_13c04s091_1995.pdf</a>  (A8) 2. Control Techniques for VOC Emissions from Stationary Sources (EPA-453/R-92-018, 12/92, NTIS PB-93-150-258)</p>
VOC Model Rules		<p>Model VOC Rules for RACT (EPA, OAQPS, 6/92)  <a href="http://www.epa.gov/ttn/naaqs/ozone/ozonetech/voc_modelrules.pdf">http://www.epa.gov/ttn/naaqs/ozone/ozonetech/voc_modelrules.pdf</a></p>
Fugitive		<p>(#23) Fugitive Emission Sources of Organic Compounds - Additional Information on Emissions, Emission Reductions, and Costs (EPA 450/3-82-010, 4/82, NTIS PB-82-217 126) Does not define RACT for any particular source.  EPA R9 has an electronic copy</p>

Category	EPA Documents	
General	CTGs	ACTs / other documents to help establish RACT at Major sources
Coating & Solvents		
Coating		<p>(#2) Control of Volatile Organic Emissions from Existing Stationary Sources, Volume I: Control Methods for Surface Coating Operations (EPA-450/2-76-028, 11/76, NTIS PB-260-386),  <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s0227/reference/ref_04c04s0227_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s0227/reference/ref_04c04s0227_1995.pdf</a></p>
Adhesives & Sealants		
Aerospace	<p>(P4) Control of VOC Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations CTG &amp; MACT (See 59 FR 29216, 6/6/1994); CTG (Final), EPA-453/R-97-004, 12/97).  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/ctg.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/ctg.pdf</a></p>	
Architectural Coatings		<p>National VOC Emission Standards for Architectural Coatings (40 CFR 59 Subpart D, 9/11/98).  <a href="http://epa.gov/ttn/atw/183e/aim/aimpg.html">http://epa.gov/ttn/atw/183e/aim/aimpg.html</a></p>
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.  <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s0227/reference/ref_02c04s0227_Jan1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s0227/reference/ref_02c04s0227_Jan1995.pdf</a></p>	<p>2. Reduction of VOC Emissions from Automobile Refinishing (EPA-450/3-88-009, 10/88, NTIS PB-89-148-282), ACT.  <a href="http://www.p2pays.org/ref/12/11336.pdf">http://www.p2pays.org/ref/12/11336.pdf</a>            (A14) 3. ACT Document: Surface Coating of Automotive/Transportation and Business Machine Plastic Parts (EPA-453/R-94-017, 2/94, NTIS PB-94-158-086).            (A15) 4. ACT Document: Auto. Refinishing (EPA-453/R-94-031, 4/94, NTIS PB-94-191-699). Note a national rule was issued in 1998 after the ACT. See 40 CFR 59.100. <a href="http://www.epa.gov/clariton/clhtml/pubtitle.html">www.epa.gov/clariton/clhtml/pubtitle.html</a>            5. National VOC Emission Standards for Automobile Refinish Coatings (40 CFR 59 Subpart B, 9/11/98).  <a href="http://epa.gov/ttn/atw/183e/arc/arcpag.html">http://epa.gov/ttn/atw/183e/arc/arcpag.html</a></p>
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.  <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s091/reference/ref_03c04s091_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s091/reference/ref_03c04s091_1995.pdf</a></p>	<p>(A17) 3. ACT Document: Offset Lithographic Printing (EPA-453/R-94-054, 6/94, NTIS PB-95-201-018).  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/lact.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/lact.zip</a></p>

Category	EPA Documents	
General	CTGs	ACTs / other documents to help establish RACT at Major sources
Large Appliances	(#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. <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s0224/reference/ref_02c04s0224_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s0224/reference/ref_02c04s0224_1995.pdf</a>	
Magnet Wire	(#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. <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s0223/reference/ref_01c04s0223_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s0223/reference/ref_01c04s0223_1995.pdf</a>	
Metal Coil, Container, & Closure	See automobile coating.	
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 <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s0224/reference/ref_01c04s0224_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s0224/reference/ref_01c04s0224_1995.pdf</a> .	
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. <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s0224/reference/ref_03c04s0224_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s0224/reference/ref_03c04s0224_1995.pdf</a>	
Paper & Fabric	See automobile coating.	
Plastic Parts		1. ACT Document: Surface Coating of Automotive/Transportation and Business Machine Plastic Parts (EPA 453/R-94-017, 2/94). 2. See automobile coating.

Category	EPA Documents	
General	CTGs	ACTs / other documents to help establish RACT at Major sources
Ships	<p>(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  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/ship-1.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/ship-1.zip</a>  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/ship-2.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/ship-2.zip</a>  and  (P3) 2. CTG, see 61 FR 44050, 8/27/96. FR notice:  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/shipctg.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/shipctg.zip</a></p>	
Solvent Cleaning	<p>(#4) 1. Control of Volatile Organic Emissions from Solvent Metal Cleaning, (EPA-450/2-77-022, 11/77, NTIS PB-274-557), CTG.  <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s06/reference/ref_02c04s06_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s06/reference/ref_02c04s06_1995.pdf</a></p>	<p>(A4) 2. ACT Document - Halogenated Solvent Cleaners (EPA-450/3-89-030, 8/89, NTIS PB-90-103-268).  (A13) 3. ACT Document: Industrial Cleaning Solvents (EPA-453/R-94-015, 2/94, NTIS PB-94-156-79).  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/indsol-1.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/indsol-1.zip</a>  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/indsol-2.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/indsol-2.zip</a></p>
Traffic Markings		<p>(A2) Reduction of VOC Emissions from the Application of Traffic Markings (EPA-450/3-88-007, 8/88, NTIS PB-89-148-274, ACT). The Architectural and Industrial Maintenance Coatings rule included limits for traffic markings and superseded the ACT. See 40 CFR 59.400. EPA R9 has an electronic copy.</p>
Wood Coating	<p>(#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.  <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s0225/reference/ref_01c04s0225_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s0225/reference/ref_01c04s0225_1995.pdf</a></p>	
Wood Furniture	<p>(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.  <a href="http://www.epa.gov/ttn/atw/wood/finalctg.pdf">http://www.epa.gov/ttn/atw/wood/finalctg.pdf</a>  <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/ctgadden.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/ctgadden.pdf</a></p>	<p>(A1) Control Techniques for Organic Emissions from Plywood Veneer Dryers, EPA-450/3-83-012. May 1983. This document is labeled as a control technique document (CTD) rather than an ACT. However, the information is similar to that in an ACT.</p>

Category	EPA Documents	
General	CTGs	ACTs / other documents to help establish RACT at Major sources
Petroleum		
Gasoline Plants	<p>(#10) Control of Volatile Organic Emissions from Bulk Gasoline Plants (EPA-450/2-77-035, 12/77, NTIS PB-276-722), CTG. EPA R9 has an electronic copy.</p>	
Natural Gas/Gasoline	<p>(#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. EPA R9 has an electronic copy.</p>	
Refineries	<p>(#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. EPA R9 has an electronic copy.</p> <p>(#16) 2. Control of VOC Leaks from Petroleum Refinery Equipment (EPA-450/2-78-036, 6/78, NTIS PB-286-158), CTG. EPA R9 has an electronic copy.</p>	<p>3. Petroleum Refinery Tier 2 BACT Analysis Report (Eastern Research Group for EPA, 1/16/01 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/bactrpt.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/bactrpt.pdf</a> (A5) 4. ACT Document - Organic Waste Process Vents (EPA-450/3-91-007, 12/90 NTIS PB91-148270)</p> <p>5. Control Technology Center Document - Industrial Wastewater Volatile Organic Compound Emissions - Background Information for BACT/LAER Determinations (EPA-40/3-90-004, NTIS PB90-194754)</p>
Service Stations	<p>(#1) 1. Design Criteria for Stage I Vapor Control Systems - Gasoline Service Stations, (11/75), CTG. - EPA R9 has an electronic copy</p>	<p>2. Technical Guidance -- Stage II Vapor Recovery Systems for Control of Vehicle Refueling Emissions at Gasoline Dispensing Facilities (EPA-450/3-91-022a &amp; b, 11/91).</p> <p>3. Guidelines - Gasoline Vapor Recovery - Minimum SIP Requirements for EPA Region IX to Approve a Phase I or Phase II Gasoline Transfer Rule for Ozone Nonattainment Areas, (EPA Region 9, 4/00). EPA R9 has an electronic copy.</p>
Synthetic Organic Chemical	<p>(#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. EPA R9 has an electronic copy</p> <p>(P1) 2. Control of VOC Emissions from Reactor Processes and Distillation Operations in SOCM (EPA-450/4-91-031, 11/15/93, NTIS PB-92-180-009), CTG. EPA R9 has an electronic copy</p>	



Category	EPA Documents	
General	CTGs	ACTs / other documents to help establish RACT at Major sources
Tanks	<p>(#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.</p> <p>(#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.</p> <p><a href="http://www.epa.gov/clariton/clhtml/pubtitle.html">www.epa.gov/clariton/clhtml/pubtitle.html</a></p>	<p>(A11) 3. Volatile Organic Liquids Storage in Floating and Fixed Roof Tanks (EPA-453/R-94-001, 2/94, NTIS PB-94-152-741), ACT.</p> <p><a href="http://www.epa.gov/clariton/clhtml/pubtitle.html">http://www.epa.gov/clariton/clhtml/pubtitle.html</a></p>
Tank Trucks	<p>(#6) 1. Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals (EPA-450/2-77-026, 12/77, NTIS PB-275-060), CTG. EPA R9 has an electronic copy.</p> <p>(#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. EPA R9 has an electronic copy.</p>	
Combustion		
Boilers, Steam Generators, Process Heaters		<p>(N3) 1. ACT Document -- NOx Emissions from Process Heaters (Revised) (EPA-453/R-93-034, 9/93).  <a href="http://www.epa.gov/ttn/catc/dir1/procheat.pdf">http://www.epa.gov/ttn/catc/dir1/procheat.pdf</a></p> <p>(N5) 2. ACT Document -- NOx Emissions from Utility Boilers (EPA-453/R-94-023, 3/94).  <a href="http://www.epa.gov/ttn/chief/old/ap42/ch01/s01/reference/ef27_c01s01_1998.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch01/s01/reference/ef27_c01s01_1998.pdf</a></p> <p>(N7) 3. ACT Document -- NOx Emissions from Industrial/Commercial/Institutional (ICI) Boilers (EPA-453/R-94-022, 3/94).  <a href="http://www.epa.gov/ttn/catc/dir1/icboiler.pdf">http://www.epa.gov/ttn/catc/dir1/icboiler.pdf</a></p>
Cement Kilns		<p>(N6) ACT Document -- NOx Emissions from Cement Manufacturing (EPA-453/R-94-004, 3/94). Updated September 2000. Electronic copy of 1994 doc:  <a href="http://www.epa.gov/ttn/catc/dir1/cement.pdf">http://www.epa.gov/ttn/catc/dir1/cement.pdf</a></p>
Gas Turbines		<p>(N2) ACT Document -- NOx Emissions from Stationary Gas Turbines (EPA-453/R-93-007, 1/93).  <a href="http://www.epa.gov/ttn/catc/dir1/gasturb.pdf">http://www.epa.gov/ttn/catc/dir1/gasturb.pdf</a></p>
Glass Furnaces		<p>(N8) ACT Document -- NOx Emissions from Glass Manufacturing (EPA-453/R-94-037, 6/94).  <a href="http://www.epa.gov/ttn/catc/dir1/glassact.pdf">http://www.epa.gov/ttn/catc/dir1/glassact.pdf</a></p>

Category	EPA Documents	
General	CTGs	ACTs / other documents to help establish RACT at Major sources
Internal Combustion Engines		(N4) ACT Document -- NOx Emissions from Stationary IC Engines, (EPA-453/R-93-032, 7/93. Updated 9/2000. <a href="http://www.epa.gov/ttn/chief/old/ap42/roystuff/sect0302/rel_c03s02_jul1993.pdf">http://www.epa.gov/ttn/chief/old/ap42/roystuff/sect0302/rel_c03s02_jul1993.pdf</a>
Iron and Steel		(N9) NOx emissions from Iron and Steel Mills, EPA 453/R-94-065, 9/94. EPA R9 has a copy.
Municipal Waste Combustion		1. 40 CFR 60 subpart Cb - Emission Guidelines and Compliance Schedules for Municipal Waste Combustors. <a href="http://www.access.gpo.gov/cgi-bin/cfrassemble.cgi?title=200540">http://www.access.gpo.gov/cgi-bin/cfrassemble.cgi?title=200540</a> 2. 40 CFR 62 subpart FFF, Federal Plan for existing large MWC units. <a href="http://www.access.gpo.gov/cgi-bin/cfrassemble.cgi?title=200540">http://www.access.gpo.gov/cgi-bin/cfrassemble.cgi?title=200540</a>
NOx Rules		1. Summary of State NOx RACT rules 9/29/95 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/noxregsm.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/noxregsm.pdf</a> 2. Cost effective NOx RACT 3/16/94 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/noxregsm.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/noxregsm.pdf</a> 3. De Minimis values for NOx RACT 1/1/95 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/demin.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/demin.pdf</a> 4. Scope of NOx Exemptions RACT 1/12/95 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/exempnox.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/exempnox.pdf</a> 5. Fuel switching to NOx RACT 7/30/93 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/fuelsw.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/fuelsw.pdf</a> 6. Section 182(f) NOx Exemptions Revised Process and Criteria 2/8/95 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/noxexmp.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/noxexmp.pdf</a> 7. NOx questions from Ohio EPA 1993 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/ohio.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/ohio.pdf</a> 8. NOx RACT for Repowering of Utility Boilers 3/9/94 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/repower.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/repower.pdf</a> 9. NOx Exemptions Revised Process and Criteria 5/27/94 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/reproc.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/reproc.pdf</a> 10. NOx Policy Documents for the CAA of 1990 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/ttnsum.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/ttnsum.pdf</a>
PM		
Generic PM		PM-10 Guideline Document (EPA-452/R-93-008, 4/93)
Open Burning		Guidelines - Open Burning Rule Exemption (EPA Region IX, 10/18/02). EPA R9 has an electronic copy.

Category	EPA Documents	
General	CTGs	ACTs / other documents to help establish RACT at Major sources
Residential Wood Combustion		1. Technical Information Document for Residential Wood Combustion (EPA-450/2-92-002, 9/92) <a href="http://www.epa.gov/clariton/clhtml/pubtitle.html">www.epa.gov/clariton/clhtml/pubtitle.html</a> 2. Guidelines - Minimum BACM/RACM for Residential Wood Combustion (EPA Region IX, 10/25/02). EPA R9 has an electronic copy. 3. Available Residential Wood Combustion Control Measures (57 FR 18072, 4/28/92), RACT.
Prescribed Burning		Prescribed Burning Control Measures (57 FR 18072, 4/28/92), RACT.
Fugitive Dust		Available Fugitive Dust Control Measures (57 FR 18072, 4/28/92), RACT.
Opacity		Final Disapproval of ADEQ Rule R18-2-702 for BACM/RACT analysis (Docket AZ-02-60F). (67 FR 59456 9/23/02) EPA R9 has an electronic copy.
De Minimis Analysis		1. 59 FR 42011 (8/16/94) 2. 40 CFR 51.165(b)(1). <a href="http://www.access.gpo.gov/cgi-bin/cfrassemble.cgi?title=200540">http://www.access.gpo.gov/cgi-bin/cfrassemble.cgi?title=200540</a>
Other		
Cutback Asphalt	(#12) Control of VOC from Use of Cutback Asphalt (EPA-450/2-77-037, NTIS PB 278-185), CTG. <a href="http://www.epa.gov/ttn/chief/old/ap42/ch04/s05/reference/ref_03c04s05_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch04/s05/reference/ref_03c04s05_1995.pdf</a>	
Bakeries		(A8) 1. ACT Document - Bakery Oven Emissions (EPA-453/R-92-017, 12/92) <a href="http://epa.gov/ttn/atw/bakery/bakery92.pdf">http://epa.gov/ttn/atw/bakery/bakery92.pdf</a> 2. Issues Concerning Bakery RACT Requirements 2/8/95 <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/bakery.pdf">http://www.epa.gov/ttn/oarpg/t1/memoranda/bakery.pdf</a>
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. EPA R9 has an electronic copy.	(#21) 1. Control of Volatile Organic Emissions from Perchloroethylene Dry Cleaning Systems (EPA-450/2-78-050, 12/78, NTIS PB-290-613), (CTG no longer relevant as PERC is exempted as a VOC - however there is a MACT std for PERC drycleaners) <a href="http://www.epa.gov/clariton/clhtml/pubtitle.html">www.epa.gov/clariton/clhtml/pubtitle.html</a>
Ethylene Oxide		(A3) ACT Document - Ethylene Oxide Sterilization/Fumigation Operations (EPA-450/3-89-007, 3/89, NTIS PB-90-131-434).

Category	EPA Documents	
General	CTGs	ACTs / other documents to help establish RACT at Major sources
Fertilizer		Control of Fluoride Emissions From Existing Phosphate Fertilizer Plants (EPA-450/2-77-005, 3/77) <a href="http://www.epa.gov/ttn/chief/old/ap42/ch08/s051/reference/ref_06c08s051_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch08/s051/reference/ref_06c08s051_1995.pdf</a>
Ink & Paint Manufacture		Control of VOC Emissions from Ink and Paint Manufacturing Processes (EPA-450/3-92-013, 4/92).
Leather Tanning		Air Emissions and Control Technology for Leather Tanning and Finishing Operations (EPA-453/R-93-025, 6/93).
Nitric & Adipic Acid		(N1) ACT Document -- Nitric and Adipic Acid Manufacturing Plants (EPA-450/3-91-026, 12/91). <a href="http://www.epa.gov/ttn/catc/dir1/nitric.pdf">http://www.epa.gov/ttn/catc/dir1/nitric.pdf</a>
Pesticides		(A10) Control of VOC Emissions from the Application of Agricultural Pesticides (EPA-453/R-92-011, 3/93, NTIS PB-93-199-131), ACT.
Pharmaceutical Products	(#17) Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products (EPA-450/2-78-029, 12/78, NTIS PB-290-580), CTG. <a href="http://www.epa.gov/ttn/chief/old/ap42/ch06/s10/reference/ref_01c06s10_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch06/s10/reference/ref_01c06s10_1995.pdf</a> (partial)	
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. <a href="http://www.epa.gov/clariton/clhtml/pubtitle.html">http://www.epa.gov/clariton/clhtml/pubtitle.html</a> (#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. <a href="http://www.epa.gov/clariton/clhtml/pubtitle.html">http://www.epa.gov/clariton/clhtml/pubtitle.html</a>	3. Control of VOC Emissions from Manufacture of Styrene-Butadiene Copolymers - Preliminary Draft CTG 4/81 <a href="http://www.epa.gov/ttn/chief/old/ap42/ch06/s10/reference/ref_01c06s10_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch06/s10/reference/ref_01c06s10_1995.pdf</a> (A6) 4. Polystyrene Foam Manufacturing (EPA 450/3-90-020 NTIS PB91-102111)
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. <a href="http://www.epa.gov/clariton/clhtml/pubtitle.html">www.epa.gov/clariton/clhtml/pubtitle.html</a>	

EPA Documents		
Category		
General	CTGs	ACTs / other documents to help establish RACT at Major sources
Sulfuric Acid		Control of Sulfuric Acid Mist Emissions from Existing Sulfuric Acid Production Units (EPA-450/2-77-019, 9/77). <a href="http://www.epa.gov/ttn/chief/old/ap42/ch08/s10/reference/ref_02c08s10_1995.pdf">http://www.epa.gov/ttn/chief/old/ap42/ch08/s10/reference/ref_02c08s10_1995.pdf</a>
Wastewater		(A9) 1. Control of VOC Emissions from Industrial Wastewater CTG draft EPA-453/D-93-056 9/92) <a href="http://www.epa.gov/clariton/clhtml/pubtitle.html">http://www.epa.gov/clariton/clhtml/pubtitle.html</a> (A9) 2. ACT Document: Air Emissions from Industrial Wastewater (4/94), ACT consists of cover memo with option tables and CTG draft. <a href="http://www.epa.gov/ttn/oarpg/t1/memoranda/iwwact.zip">http://www.epa.gov/ttn/oarpg/t1/memoranda/iwwact.zip</a>

Source for most of EPA information above is: [http://www.epa.gov/ttn/atw/ctg\\_act.html](http://www.epa.gov/ttn/atw/ctg_act.html)

ACT Alternative Control Techniques Document

CTG Control Techniques Guidelines Document

FR Federal Register documents can be found at: <http://www.gpoaccess.gov/fr/index.html>

NTIS National Technical Information Service, 1-800-553-6847

ZIP Compressed files with \*.wpf are saved in Word Perfect format

(XX) EPA use - Bold coding refers back to OAQPS CTG/ACT listing (may change as OAQPS updates their list)

eg 4 = #4 of Pre 1990 CTGs

P4 = #4 of Post 1990 CTGs

A4 = #4 of the VOC ACTs

N4 = #4 of the NOx ACTs

## **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:** \_\_\_\_\_

**Area Code/**  
**Telephone/Extension:** (530) 621-5355

**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)DateTitle

- ☒ Signed by Lead Agency  
☐ Signed by Applicant

Date received for filing at OPR: