

**PLACER COUNTY  
AIR POLLUTION CONTROL DISTRICT**

**STAFF REPORT**

**2020 Reasonably Available Control Technology  
State Implementation Plan Analysis**

**Compliance with the Federal 2015 Eight-Hour Ozone NAAQS**

**May 2020**

## Contents

Background  
Methodology  
RACT Evaluation  
Analysis  
Findings  
Summary

### Tables

1. Federal RACT Guidance Documents (CTGs)
2. Existing District Rules that Control NO<sub>x</sub> or VOCs
3. Negative Declarations
4. Every Feasible Measure

Attachment 1. RACT Evaluating of Existing District Rules

## **BACKGROUND**

### **Purpose**

The Placer County Air Pollution Control District (District) is required to update the Reasonably Available Control Technology State Implementation Plan (“RACT SIP”) analysis. This is a result of the District’s classification as “moderate” non-attainment with the Federal 2015 eight-hour ozone National Ambient Air Quality Standard (NAAQS) of 0.070 ppmv.

### **District Air Quality Attainment Status**

The District’s jurisdiction is all of Placer County. Placer County is located in northern California, bordering Sacramento County to the west and the State of Nevada on the east. Elevations range from near sea level in the western portion of the County to 9,000 feet in the mountains of the Sierras. Placer County contains three different air basins: the Sacramento Valley Air Basin (SVAB); 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 SVAB has summers that are hot and dry with temperatures regularly above 90°F. These hot and dry summers 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 Placer County in the SVAB and MCAB are included in the Sacramento Federal Ozone Non-Attainment Area (SFONA). The SFONA has been classified as “moderate” non-attainment for the Federal 2015 eight-hour ozone NAAQS of 0.070 ppmv, with an attainment deadline of August 4, 2024 (83 FR 25776).

The SFONA’s attainment deadline for the less stringent (0.075 ppmv) 2008 Ozone NAAQS is July 7, 2025. The SFONA Districts are therefore voluntarily requesting a reclassification of the federal 2015 Ozone NAAQS nonattainment status to “serious” to allow for a new attainment deadline of August 4, 2027.

### **Federal RACT SIP Requirement**

The U.S. Environmental Protection Agency’s (U.S. EPA) Phase 2 Ozone Rule (40 CFR 51.912 and 70 FR 71612), and more recent Ozone Implementation Rule for the 2015 Ozone Standard (83 FR 62998), require that areas classified as moderate non-attainment or higher demonstrate in a State Implementation Plan (SIP) that District rules fulfill Reasonably Available Control Technology (RACT) requirements for ozone precursors of volatile organic compounds (VOC) and nitrogen oxides (NOx). This is in accordance with Federal Clean Air Act Amendments of 1990 (CAAA), Sections 182(b)(2) and 182(f).

RACT is defined as “the lowest emissions limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility” (44 FR 53762). The implementation of RACT requires:

- Rules covering source categories with RACT guidance documents -- including Control Techniques Guideline (CTG) -- issued by U.S. EPA, for which there are sources in the District with VOC emission levels triggering RACT guidance document thresholds. CTG guidance must be adopted in District rules, and RACT SIP revisions, generally within one year of the CTG issuance date.
- Rules consider the controls implemented by other regional and local air districts.
- Rules covering all major sources of NOx or VOC in the District.

## State of California Ozone Reduction Requirements

In addition to Federal SIP requirements, the District has chosen to implement Every Feasible Measure (EFM) to meet the ozone reduction requirements under State of California Health and Safety Code Section 40914(a)(2). The State of California suggests EFMs consider: regulations that have been successfully implemented elsewhere; new technologies and innovative approaches; and social, environmental, energy, and economic (cost effectiveness) factors.

Additionally, the District requires the use of Best Available Retrofit Control Technology (BARCT) for VOC and NOx as required under State of California Health and Safety Code Section 40919.

## District Planning History

The District has adopted numerous air quality attainment plans since 1991 to move toward attainment of the ozone NAAQS. Over 100 new rules and amendments have been adopted to meet the commitments in these attainment plans. The District will work cooperatively with other air districts in the SFONA to prepare an “Eight-Hour Ozone Attainment Plan” for achieving the Federal 2015 eight-hour ozone NAAQS of 0.070 ppm.

Title	Board Adoption
1991 Placer County Air Quality Attainment Plan	March 1992
1994 Ozone Attainment Demonstration Plan	December 1994
1997 Triennial Progress Report	July 1998
1999 Sacramento Area Regional Milestone Report	April 2000
2000 Triennial Progress Report	April 2001
2002 Sacramento Area Regional Milestone Report	May 2003
2003 Triennial Progress Report	October 2005
Sacramento Regional Non-Attainment Area Eight-Hour Ozone Rate-of-Progress Plan	February 2006
Sacramento Regional Non-Attainment Area Eight-Hour Ozone and Reasonable Further Progress Plan	February 2009
2009 Triennial Progress Report	August 2010
2012 Triennial Progress Report	October 2013
Sacramento Regional PM2.5 Implementation/Maintenance Plan and Re-Designation Request	February 2014
2014 RACT SIP for Federal 2008 Eight-Hour Ozone Standard	April 2014
2019 RACT SIP for Oil and Natural gas Industry Source Category	December 2019

## District RACT SIP History

The District’s last thorough RACT SIP analysis was accomplished in 2014. This analysis was required when the SFONA was classified as “severe-15” for the Federal 2008 eight-hour ozone NAAQS. The RACT SIP was approved by the District Board on April 14, 2014; and subsequently approved by the U.S. EPA on September 14, 2017 (82 FR 38604). The 2014 RACT SIP determined no new District rules or existing District rule amendments were required.

Since then, on October 27, 2016, U.S. EPA released a CTG for the Oil and Natural Gas Industry (EPA-453/B-16-001). The District has reviewed its permit files and emission inventory and has determined that there are no such stationary sources or emitting facilities in the nonattainment area under the District’s jurisdiction. Therefore, there is no requirement to adopt a rule for those sources. The District Board approved a negative declaration for the CTG for the Oil and Natural Gas Industry

source category on December 12, 2019. The negative declaration was submitted to U.S. EPA on January 21, 2020 for final approval.

## **METHODOLOGY**

### **RACT SIP**

The RACT SIP analysis involves the following procedures, consistent with U.S. EPA Region IX guidance, as contained in a letter from Andrew Steckel dated March 9, 2006:

- **Source Category Identification:** Identify all source categories in the District that require RACT. These include:
  - Source categories which have applicable RACT guidance (U.S. EPA issued CTGs), and for which any sources (either minor or major) operate in the District.
  - Source categories for which major sources of NO<sub>x</sub> or VOC operate in the District.
- **RACT Determination:** For each source category that requires RACT, identify if there is a District rule. If there is no rule, then a new District rule that meets RACT must be developed and promulgated. If there is an existing District rule, then a determination must be made if the existing District rule reflects RACT. This is based on an analysis of the applicable District rule with guidance and regulations used to establish RACT:
  - **Federal U.S. EPA:** Control Techniques Guidelines (CTG) for VOC control and Alternative Control Techniques (ACT) for NO<sub>x</sub> control.

This might also consider other rules as appropriate that control VOC and NO<sub>x</sub>, potentially including Maximum Achievable Control Technology (MACT) and National Emissions Standards for Hazardous Air Pollutants (NESHAP) Standards, and New Source Performance Standards (NSPS).
  - **State:** California Air Resources Board (CARB) Suggested Control Measures, and State RACT guidance.
  - **Local:** Rules from local air districts in the Sacramento region.

The RACT determination will identify for each source category:

- Existing District rules that meet RACT.
  - Existing District rules that require amendments to meet RACT.
  - New rules required to meet RACT.
- **Negative Declaration:** Negative declarations are required for all source categories for which there is federal RACT guidance (CTG) but for which there are no operating facilities (major or minor) within the District, or for which there are facilities with emissions below the RACT guidance threshold.

To determine if there are any facilities operating within the District with a source category with RACT guidance, the following checks are conducted:

- District internal database of permitted sources.
- Internet website searches for key words.
- Business listings through city and county databases.
- Industrial trade groups.
- Yellow pages.

## Every Feasible Measure

The EFM determination is based on a comparison of existing District rules with those in other air districts in the Sacramento region.

## RACT EVALUATION

### Identification of Source Categories

Source categories considered for the RACT SIP analysis include:

#### Federal RACT Guidance Documents

Table 1 lists source categories affected by Federal RACT guidance documents -- all U.S. EPA issued CTGs.

There has been only one new CTG (Oil and Natural Gas Industry, EPA-453/B-16-001) published since our last previous RACT SIP analysis of April 2014. For this source category (Oil and Natural Gas Industry) the District does not have any applicable sources per a Negative Declaration approved by the District Board on December 12, 2019.

#### District VOC and NOx Rules

Table 2 lists the District prohibitory rules (21) that limit NOx or VOC at existing District sources.

This is the same list as the previous RACT SIP analysis of April 2014.

#### Major Sources of NOx and VOC

District Rule 502, New Source Review, defines major sources as those with permitted potential to emit (PTE) greater than 25 tons per year of NOx or VOC. There are three major sources of NOx in the District:

- Rio Bravo Rocklin. Biomass electricity boiler with the PTE of 131 tons/yr NOx.
- Sierra Pacific Industries. Biomass cogeneration boiler with PTE of 164 tons/yr NOx.
- Roseville Electric Energy Park. Natural gas turbines with PTE of 31 tons/yr NOx.

These sources represent two source categories with existing District rules that control NOx: Rule 233, Biomass Boilers, and Rule 250, Stationary Gas Turbines.

The District does not have any sources with permitted VOCs that exceed the major source threshold (i.e., sources that emit or have the potential to emit at least 25 tons per year).

The Western Regional Sanitary Landfill is a potential major source of VOC emissions considering fugitive emissions estimated from their green waste composting operations. The composting facility has a capacity of approximately 83,000 green tons of green wastes, and a typical throughput of 60,000 green tons per year. Compost is processed in open windrows. Compost bed moisture is controlled to 50% and temperature from 45-55°C, both of which are monitored daily. Compost windrows are mixed and aerated using a mechanical turner, as frequently as necessary to maintain temperature, moisture, and desired compost composition. At this time, the District has chosen to not directly control VOCs from the composting due to uncertainty in the composting VOC emission factor applicable to feedstock and operations, the fugitive uncontrolled nature of compost emissions, lack of consistency in the rules of other districts in the region, and lack of established cost effective control options.

Confined animal feeding lots in the District have estimated VOC emissions an order of magnitude below the major source threshold.

PABCO/Gladding McBean is a major source for CO emissions only. Thus, a RACT rule is not required for this source.

There are no new major sources of emissions in the District since the previous RACT SIP Analysis in April 2014, and these are the same major sources analyzed in that RACT SIP.

## **RACT Determination**

### Federal RACT Guidance Documents

Table 1 lists each of the currently available Federal CTGs. For each CTG source category, it identifies whether there are sources that operate in the District in the category, and if so, the District prohibitory rule for that category.

There are 20 CTGs for which there are District sources and for which the CTG is applicable; and 2 for which we have sources but none of them meet the CTG applicability threshold. For each of the 20 CTGs for which there are applicable District sources, the District has an existing prohibitory rule. As discussed below, each of these rules meet RACT except for Rule 216, Organic Solvent and Degreasing, which the District commits to amend in the coming year.

### Existing District Rules Determined to Meet RACT

Table 2 lists all (21) of the District prohibitory rules that control NO<sub>x</sub> or VOCs. We have determined they all meet RACT requirements except for Rule 216. These include:

- 15 rules that cover CTGs.
- 4 rules that cover minor sources of NO<sub>x</sub> or VOC.
- 2 rules that cover major sources of NO<sub>x</sub>.

Table 2 contains the following information:

- Source category title.
- Applicable federal guidance title, report number, and date; existing District rule number, title, and date of last rule amendment, if any.
- Status and size class of operating sources in the District.
- SIP approval status of the most recent District rule amendment, including Federal Register citation and publication date.
- Basis for the determination that the rule meets RACT.

There have been no amendments made to any SIP-approved rule. These rules, except for Rule 216, have been determined to meet RACT requirements because they have been reviewed and approved by CARB and U.S. EPA, and there has not been more-recent RACT guidance issued for the source category since the rules were SIP approved by U.S. EPA. Also, the rules have been determined to be consistent with state rules and the rules of other districts in the region.

Determination that District rules meet applicable RACT guidance documents is made through a detailed comparison of the rule with RACT compliance requirements, including control measures through recommended limits on the VOC content of coatings and other products, control device efficiency limitations, NO<sub>x</sub> limits from fuel combustion sources, recordkeeping and reporting, and test methods.

Determination that District rules are consistent with rules of other air districts in the region is made through a survey and contact with Sacramento, El Dorado, Feather River and Yolo-Solano Air Districts.

Attachment 1 includes the RACT evaluation of District rules and concludes all existing District rules meet RACT -- except for Rule 216 which the District commits to amend in the coming year.

#### Existing District Rules to be Amended

Existing District Rule 216 will be amended in the coming year to meet RACT, as described in detail in Attachment 1.

#### New District Rules

District rules meet RACT for each source category for which U.S. EPA has prepared a CTG or ACT document, for all sources that exceed RACT guidance thresholds, or for any major source of NO<sub>x</sub> or VOC – except for District Rule 216 which will be amended in the coming year. No new rules are required to meet RACT.

#### Negative Declarations

Table 3 lists the 19 source categories for which there is Federal RACT guidance (CTG), but for which the District has determined there are no sources in the category, or if any sources were found, the source's potential VOC and NO<sub>x</sub> emissions are below the RACT guidance applicability threshold.

New sources are subject to the requirements of District Rule 502, New Source Review, which are significantly more stringent than RACT.

Table 3 also lists 14 source categories for which there is ACT guidance, but for which the District does not have any such sources.

The District has determined there are no major sources<sup>1</sup> of VOC emissions under permit.

#### **Every Feasible Measure**

Table 4 lists all source categories for which the state has identified the requirement of an evaluation for the need of Every Feasible Measure. Existing District rules satisfy EFM requirements, as documented in Table 4.

#### **New Rules to be Adopted to Meet “Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan”**

The District has no current outstanding and unfulfilled commitments for new rules as part of the latest “Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan” (Regional Attainment Plan) for the 2008 8-hour ozone standard, which was adopted by the Board Directors on October 12, 2017.

Currently, the District is working cooperatively with our regional air district partners to develop a plan for upcoming compliance with the Federal 2015 eight-hour ozone standard. If any additional control strategy is identified, this will likely result in selection of new rulemakings for additional source categories.

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<sup>1</sup> A major source is defined as a stationary source that emits or has the potential to emit at least 25 tons per year.



## **ANALYSIS**

The following Analysis and the subsequent Findings are intended to address the requirements set forth in the California Health and Safety Code relating to adoption of RACT SIP Analysis (and new or amended District rules), as well as other state statutes referenced herein.

### **1. Cost-Effectiveness of a Control Measure**

California Health and Safety Code Section 40703 requires the District to consider and make public the "cost-effectiveness" of District control measures. The cost effectiveness of the RACT SIP Analysis findings and recommendation -- the new rules and rule amendments needed to meet RACT -- will be assessed in detail when each of the separate rules are developed and adopted by the Board in the future to ensure that they are acceptable. There is no immediate cost impact of these RACT SIP Analysis recommendations as there are no new rules needed to meet RACT, and the identified amendment needed for Rule 216 will not have any impact on District source operations.

### **2. Socioeconomic Impact**

California Health and Safety Code Section 40728, in relevant part, requires the Board to consider the socioeconomic impact of any new or amended rule if air quality or emission limits are significantly affected. The expected socioeconomic impact of the RACT SIP Analysis (and new rules and rule amendments to meet RACT) will be assessed when the rules are adopted to ensure that they are acceptable. At this time, there are no new rules needed to meet RACT, and Rule 216 requires amendment.

### **3. Environmental Review and Compliance**

California Public Resources Code Section 21159 requires that an environmental analysis of the reasonably foreseeable methods of compliance should be conducted. The RACT SIP analysis (and new rules and rule amendments required to meet RACT) will reduce emissions from sources and will not cause any significant adverse effects on the environment. There are no adverse environmental impacts that will be caused by compliance with the new rules and rule amendments as there are no new rules, and one amendment to Rule 216, needed to meet RACT. Nonetheless, an environmental review will be conducted at the time each rule or rule amendment is proposed for adoption.

The RACT SIP analysis is exempt from the California Environmental Quality Act (CEQA) because: (1) it can be seen with certainty there is no possibility the activity in question may have a significant adverse effect on the environment (CEQA Guidelines Section 15061(b)(3)); and (2) it is an action by a regulatory agency for protection of the environment (Class 8 Categorical Exemption, CEQA Guidelines Section 15308).

## **FINDINGS**

- A. **Necessity:** The adoption of the RACT SIP Analysis satisfies the District's objective to reduce VOCs to achieve attainment with ambient air standards for ozone, and meets the District's requirements to implement Every Feasible Measure as required under California Health and Safety Code Sections 40919.
- B. **Authority:** California Health and Safety Code, Sections 40000, 40001, 40701, 40702, 40716, 41010, and 41013, are provisions of law that provide the District with the authority to adopt this RACT SIP Analysis.
- C. **Clarity:** There is no indication at this time that the RACT SIP Analysis is written in such a manner that persons affected by the analysis cannot easily understand them.
- D. **Consistency:** The RACT SIP Analysis is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations.
- E. **Non-Duplication:** The RACT SIP Analysis does not impose the same requirements as an existing state or federal regulation.
- F. **Reference:** All statutes, court decisions, and other provisions of law used by the District in interpreting this RACT SIP Analysis are incorporated into this analysis and this finding by reference.

## **SUMMARY**

The RACT SIP Analysis has determined that existing District rules are sufficient to satisfy the Federal RACT SIP requirement for the Federal 2015 Eight-hour Ozone NAAQS, with the exception of Rule 216. No new District rules are required. Rule 216 will be amended in the coming year to meet RACT.

The District will prepare a negative declaration for the following source categories for which there is an applicable Federal RACT guidance document (CTG) but for which there are no operating sources in the District that are subject to the CTGs (see Table 3 for a complete list of negative declarations):

- Aerospace Coatings
- Automobile and Light-duty Truck Assembly Coatings
- Dry Cleaning (Petroleum)
- Fiber Glass Boat Manufacturing
- Flexible Package Printing
- Large Appliances Surface Coatings
- Magnet Wire
- Metal Furniture Coatings
- Natural Gas/Gasoline Processing
- Oil and Natural Gas
- Paper and Fabric
- Paper, Film, and Foil Coatings
- Pharmaceutical Products
- Polyester Resins Manufacturing
- Refineries
- Rubber Tires
- Ships/Marine Coatings
- Synthetic Organic Chemicals Manufacturing
- Wood Furniture Manufacturing Operations

And a declaration that we do not have any major sources of permitted VOC emissions.

Table 1

Federal RACT Guidance CTG Source Categories

Table 1. Federal RACT Guidance (CTGs)

CTG #	Source Category/Title	PCAPCD Sources	PCAPCD Rule
EPA-450/R-75-102	Design Criteria for Stage I Vapor Control – Gasoline Service Stations	Yes	214
EPA-450/2-77-008	Surface Coating of Cans	Yes	223
EPA-450/2-77-008	Surface Coating of Coils	No	No
EPA-450/2-77-008	Surface Coating of Paper	No	No
EPA-450/2-77-008	Surface Coating of Fabric	No	No
EPA-450/2-77-008	Surface Coating of Automobiles and Light-Duty Trucks	No	No
EPA-450/2-77-022	Solvent Metal Cleaning	Yes	216 / 240
EPA-450/2-77-025	Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds	No	No
EPA-450/2-77-026	Tank Truck Gasoline Loading Terminals	Yes	215
EPA-450/2-77-032	Surface Coating of Metal Furniture	No	No
EPA-450/2-77-033	Surface Coating of Insulation of Magnet Wire	No	No
EPA-450/2-77-034	Surface Coating of Large Appliances	No	No
EPA-450/2-77-035	Bulk Gasoline Plants	Yes	215
EPA-450/2-77-036	Storage of Petroleum Liquids in Fixed-Roof Tanks	Yes	212
EPA-450/2-77-037	Cutback Asphalt	Yes	217
EPA-450/2-78-015	Surface Coating of Miscellaneous Metal Parts and Products	Yes	245
EPA-450/2-78-029	Manufacture of Synthesized Pharmaceutical Products	No	No
EPA-450/2-78-030	Manufacture of Pneumatic Rubber Tires	No	No
EPA-450/2-78-032	Factory Surface Coating of Flat Wood Paneling	Yes	238
EPA-450/2-78-033	Graphic Arts-Rotogravure and Flexography	Yes	239
EPA-450/2-78-036	Leaks from Petroleum Refinery Equipment	No	No
EPA-450/2-78-047	Petroleum Liquid Storage in External Floating Roof Tanks	Yes	212
EPA-450/2-78-051	Leaks from Gasoline Tank Trucks and Vapor Collection Systems	Yes	213
EPA-450/3-82-009	Large Petroleum Dry Cleaners	No <sup>1</sup>	No
EPA-450/3-83-006	Leaks from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment	No	No
EPA-450/3-83-007	Leaks from Natural Gas/Gasoline Processing Plants	No	No
EPA-450/3-83-008	Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins	No	243 <sup>2</sup>
EPA-450/3-84-015	Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry	No	No
EPA-450/4-91-031	Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry	No	No
EPA-453/R-96-007	Wood Furniture Manufacturing Operations	No <sup>1</sup>	236
EPA-453/R-94-032 61 FR 44050; 8/27/96	ACT Surface Coating at Shipbuilding and Ship Repair Facilities Shipbuilding and Ship Repair Operations (Surface Coating)	No	No
EPA-453/R-97-004 59 FR 29216; 6/06/94	Aerospace MACT and Aerospace (CTG & MACT)	No <sup>1</sup>	No
EPA-453/R-06-001	Industrial Cleaning Solvents	Yes	216 / 240
EPA-453/R-06-002	Offset Lithographic Printing and Letterpress Printing	Yes	239
EPA-453/R-06-003	Flexible Package Printing	No	No
EPA-453/R-06-004	Flat Wood Paneling Coatings	Yes	238
EPA 453/R-07-003	Paper, Film, and Foil Coatings	No	No
EPA 453/R-07-004	Large Appliance Coatings	No	No
EPA 453/R-07-005	Metal Furniture Coatings	No	No
EPA 453/R-08-003	Miscellaneous Metal Parts Coatings -- Metal	Yes	245
EPA 453/R-08-003	Miscellaneous Plastic Parts Coatings -- Plastic Parts	Yes	249
EPA 453/R-08-003	Miscellaneous Plastic Parts Coatings -- Transportation and Business Machine Plastic Parts	No	249
EPA 453/R-08-003	Miscellaneous Plastic Parts Coatings -- Pleasure Craft Plastic Parts	No	249
EPA 453/R-08-003	Miscellaneous Plastic Parts Coatings -- Motor Vehicle	No	249
EPA 453/R-08-004	Fiberglass Boat Manufacturing Materials	No	No
EPA 453/R-08-005	Miscellaneous Industrial Adhesives	Yes	235
EPA 453/R-08-006	Automobile and Light-Duty Truck Assembly Coatings	No	No
EPA 453/B16-001	Oil and Natural Gas Industry	No	No

1: District has sources of this type, but none that meet the applicability threshold of the CTG

2: Rule 243 applies to operations that use polyester resin. The District does not have any sources that manufacture polyester resins.

Table 2

Existing District Rules that Control VOC and NOx

Table 2. Existing District Rules

Source Category	RACT Guidance Document -- Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Analysis Used to Determine that the Rule Meets RACT
Adhesives	Control Technique Guidelines for Miscellaneous Industrial Adhesives (EPA 453/R-08-005, 09/08); NESHAP Subpart FFFF, Misc. Organic Chemical Production and Processes (MON) (11/10/03)	Rule 235, <u>Adhesives</u> (10/11/12)	Minor	78 FR 53680 08/30/13, effective 10/29/13 (10/11/12)	Meets CTG. Consistent with regional air district rules.
Architectural Coatings	National VOC Emission Standards for Architectural Coatings (40 CFR 59 Subpart D, 63 FR 176: 48848, 09/98)	Rule 218, <u>Architectural Coatings</u> (10/14/10)	Minor	76 FR 75795 12/05/11, effective 02/03/12 (10/14/10)	Meets Federal requirements. Meets California's Suggested Control Measure (2007). Consistent with regional air district rules.
Automotive Refinishing	Reduction of Volatile Organic Compound Emissions from Automobile Refinishing (EPA-450/3-88-009, 10/88); National VOC Emission Standards for Automobile Refinish Coatings (40 CFR 59 Subpart B, 09/98)	Rule 234, <u>Automotive Refinishing</u> (10/14/10)	Minor	76 FR 75795 12/05/11, effective 02/03/12 (10/14/10)	Meets Federal requirements. Meet California's Suggested Control Measure (2005). Consistent with regional air district rules.
Boilers, Biomass		Rule 233, <u>Biomass Boilers</u> (06/14/12)	Major	78 FR 53249 08/29/13 (06/14/12)	NOx limit of 115 ppm (on 3-hr average) is consistent with most cost-effective control (non-selective catalytic reduction). Consistent with regional air district rules. Two major sources have federal Title V permit limits of 91 ppmv.
Boilers, Water Heaters ≥ 5 million Btu/hr	NOx Emissions from Process Heaters (EPA-453/R-93-034, 09/93); NOx Emissions from Utility Boilers (EPA-453/R-94-023, 03/94); NOx Emissions from Industrial / Commercial / Institutional Boilers (EPA-453/R-94-022, 03/94)	Rule 231, <u>Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters</u> (10/09/97)	Minor	76 FR 67366 11/01/11, effective 01/03/12 (10/09/97)	Meets ACT.
Cutback Asphalt	Control of VOC from Use of Cutback Asphalt (EPA-450/2-77-037, 12/77)	Rule 217, <u>Cutback and Emulsified Asphalt Paving Materials</u> (10/19/93)	Minor	62 FR 23365 04/30/97 (10/19/93)	Meets CTG. Consistent with regional air district rules.

Table 2. Existing District Rules

Source Category	RACT Guidance Document -- Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Analysis Used to Determine that the Rule Meets RACT
Flat Wood Paneling Coatings	Control of Volatile Organic Emissions from Existing Stationary Sources for Factory Surface Coating of Flat Wood Paneling (EPA-450/2-78-032, 06/78); Control of Volatile Organic Emissions from Existing Stationary Sources Control Technique Guidelines for Flat Wood Paneling Coatings (EPA-453/R-06-004, 09/06)	Rule 238, <u>Factory Coating of Flat Wood Paneling</u> (10/14/10)	Minor	76 FR 71886 11/21/11, effective 01/20/12 (10/14/10)	Meets CTG.
Gas Turbines	NOx Emissions from Stationary Gas Turbines (EPA-453/R-93-007, 01/93)	Rule 250, <u>Stationary Gas Turbines</u> (10/08/15)	Minor and Major (non-CTG source)	81 FR 50348 08/01/16 (10/08/15)	Meets ACT. One major source (Roseville Electric) has NOx and VOC federal permit condition limits that are Best Available Control Technology.
Gasoline Bulk Plants and Terminals	Control of Volatile Organic Emissions from Bulk Gasoline Plants (EPA-450/2-77-035, 12/77); Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals (EPA-450/2-77-026, 12/77); NESHAP Subparts CCCCCC, Gasoline Dispensing Facilities (Area Sources) (1/10/08), R, Gasoline Distribution (Stage 1) (12/14/94), BBBBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (Area Sources) (01/10/08); Control of Volatile Organic Compound Leaks from Gasoline tank Trucks and Vapor Collection Systems (EPA-450/2-78-051)	Rule 215, <u>Transfer of Gasoline into Tank Trucks, Trailers, and Railroad Tank Cars at Loading Facilities</u> (06/19/97)	Minor	76 FR 5277 01/31/11 (06/19/97)	Meets CTG.
Gasoline Service Stations (Transfer to Vehicle)	Design Criteria for Stage I Vapor Control Systems – Gasoline Service Stations (EPA-450/R-75-102, 11/75); Control of Volatile Organic Compound Equipment Leaks from Natural Gas/Gasoline Processing Plants (EPA-450/3-83-007, 12/83); Technical Guidance – Stage II Vapor Recovery Systems for Control of Vehicle Refueling Emissions at Gasoline Dispensing Facilities (EPA-450/3-91-022a, 11/91); Control of VOC Leaks from Gasoline Tank Trucks and Vapor Collection Systems (EPA-450/2-78-051, 12/78)	Rule 214, <u>Transfer of Gasoline into Vehicle Fuel Tanks</u> (02/21/13)	Minor	80 FR 6345 02/10/15 (02/21/13)	Meets California Phase II Enhanced Vapor Recovery requirements.



Table 2. Existing District Rules

Source Category	RACT Guidance Document -- Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Analysis Used to Determine that the Rule Meets RACT
Gasoline Service Stations (Storage Tanks)	Design Criteria for Stage I Vapor Control Systems – Gasoline Service Stations (11/75); Control of Volatile Organic Compound (VOC) Equipment Leaks from Natural Gas/Gasoline Processing Plants (EPA-450/3-83-007, 12/83) ;Technical Guidance – Stage II Vapor Recovery Systems for Control of Vehicle Refueling Emissions at Gasoline Dispensing Facilities (EPA-450/3-91-022a, 11/91); Control of VOC Leaks from Gasoline Tank Trucks and Vapor Collection Systems (EPA-450/2-78-051, 12/78)	Rule 213, <u>Gasoline Transfer into Stationary Storage Containers</u> (10/19/93)	Minor	62 FR 23365 04/30/97 (10/19/93)	Meets all current California Phase I Enhanced Vapor Recovery requirements.
Graphic Arts	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VIII: Graphic Arts-Rotogravure and Flexography (EPA-450/2-78-033, 12/78); Control Technology Guidelines for Offset Lithographic Printing and Letterpress Printing (EPA-453/R-06-002, 09/06)	Rule 239, <u>Graphic Arts Operations</u> (10/11/12)	Minor	79 FR 14178 03/13/14 (10/11/12)	Meets CTG. Consistent with regional air district rules.
Metal Coil, Container, and Closure	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume II: Surface Coatings of Cans, Coils, Paper, Fabric, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 05/77)	Rule 223, <u>Metal Container Coating</u> (10/06/94)	Minor	60 FR 15241 03/23/95 (10/06/94)	Meets CTG. Consistent regional air district rules.
Metal Parts Coatings	Control of Volatile Organic Emissions from Existing Stationary Sources (EPA-450/2-78-015, 06/78); Control Technique Guidelines for Miscellaneous Metal and Plastic Parts Coatings (EPA 453/R-08-003, 09/08); NESHAP Subpart PPPP, Plastic Parts (4/19/04)	Rule 245, <u>Surface Coating of Metal Parts and Products</u> (08/20/09)	Minor	76 FR 30025 05/24/11 (08/20/09)	Meets CTG. Consistent with regional air district rules.
Polyester Resin Operations	CARB Determination of RACT and Best Available Retrofit Control Technology (BARCT) for Polyester Resin Operations document (01/08/91); Control of VOC Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins (EPA-450/3-83-008, 11/83); NESHAP Subpart FFFF, Misc. Organic Chemical Production and Processes (MON) (11/10/03)	Rule 243, <u>Polyester Resin Operations</u> (04/10/03)	Minor	76 FR 61057 10/03/11, effective 12/02/11 (04/10/03)	Meets CARB RACT/BARCT guidance (01/08/91). The District has no sources subject to the two CTGs for resin manufacturing operations and has no fiberglass boat manufacturing operations.

Table 2. Existing District Rules

Source Category	RACT Guidance Document -- Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Analysis Used to Determine that the Rule Meets RACT
Reciprocating Internal Combustion Engines	NOx Emissions from Stationary IC Engines (EPA-453/R-93-032, 07/93); NESHAP Subpart ZZZZ , Reciprocating Internal Combustion Engines (RICE) (6/15/04); CARB Determination of RACT and BARCT for Stationary Spark Ignited IC Engines document (11/01)	Rule 242, <u>Stationary Internal Combustion Engines</u> (04/10/03)	Minor	76 FR 67366 11/01/11, effective 1/3/12 (04/10/03)	Meets ACT and Federal requirements for NOx.
Solvent Cleaning	Control of Volatile Organic Emissions from Solvent Metal Cleaning (EPA-450/2-77-022, 77/11); Control Techniques Guidelines for Industrial Cleaning Solvents (EPA-453/R-06-001, 09/06); Alternative Control Techniques Document – Industrial Cleaning Solvents (EPA-453/R-94-015, 1994/02); Halogenated Solvent Cleaners (EPA-450/3-89-030, 89/08); NESHAP Subpart T, Degreasing Organic Cleaners (12/2/94)	Rule 216, <u>Organic Solvent Cleaning and Degreasing</u> (12/11/03)	Minor	75 FR 24406 05/05/10 (12/11/03)	Meets CTG -- but requires that exemption of Section 104.5 be removed (exemption improperly excludes solvent decreasing operations that are subject to 40 CFR Part 63 supart T.
Solvent Cleaning	Control of Volatile Organic Emissions from Solvent Metal Cleaning (EPA-450/2-77-022, 77/11); Control Techniques Guidelines for Industrial Cleaning Solvents (EPA-453/R-06-001, 09/06); Alternative Control Techniques Document – Industrial Cleaning Solvents (EPA-453/R-94-015, 1994/02); Halogenated Solvent Cleaners (EPA-450/3-89-030, 89/08); NESHAP Subpart T, Degreasing Organic Cleaners (12/2/94)	Rule 240, <u>Surface Preparation and Cleanup</u> (12/11/03)	Minor	79 FR 14178 03/13/14 (12/11/03)	Meets CTG.
Surface Coating of Plastic Parts and Products	Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings" [EPA 453/R-08-003], September 2008.	Rule 249, <u>Surface Coating of Plastic Parts and Products</u> (08/08/13)	Minor	80 FR 16289 03/27/15 (08/08/13)	Meets CTG. Consistent with regional air district rules.

Table 2. Existing District Rules

Source Category	RACT Guidance Document -- Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Analysis Used to Determine that the Rule Meets RACT
Tanks	Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed Roof Tanks (EP-450/2-77-036, 12/77); Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks (EPA-450-2/78-047, 12/78); Alternative Control Techniques Document – Volatile Organic Liquid Storage in Floating and Fixed Roof Tanks (EPA-453/R-94-001, 01/94)	Rule 212, <u>Storage of Organic Liquids</u> (06/19/97)	Minor	74 FR 27714 06/11/09 (06/19/97)	Meets CTG. Consistent with most regional air districts.
Wood Furniture Coatings	Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations (EPA-453/R-96-007, 04/96) ; NESHAP Subpart JJ, Wood Furniture (12/7/95)	Rule 236, <u>Wood Products Coating Operations</u> (10/14/10)	Minor	76 FR 71886 11/21/11, effective 01/20/12 (10/14/10)	Meets CTG. Consistent with regional air district rules. The District has no sources above the 25tpy VOC potential to emit applicability threshold of the Wood Furniture CTG.

Table 3  
Negative Declarations

Table 3. CTG/ACT Source Categories for Which a Negative Declaration is Required

Source Category	RACT Guidance Document -- Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
<b>Source Categories with CTGs</b>					
Aerospace Coatings	Control of Volatile Organic Compound (VOC) Emissions and MACT from Coating Operations at Aerospace Manufacturing and Rework Operations (EPA-453/R-97-004, 12/97); Aerospace MACT (59 FR-29216, 06/06/94); National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart GG, Aerospace Manufacturing and Rework Facilities (03/27/98)		No Major or Minor exceeding CTG thresholds or that require District Permit		Negative declaration to be adopted. The CTG applicability threshold is 25 tons/year for sources in moderate, serious, or severe non-attainment areas, and the potential VOC emissions from existing sources in the District are less than 25 tons/year.
Automobile and Light-duty Truck Assembly Coatings	Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings (EPA 453/R-08-006, 09/08); Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Primer-Surfacer and Topcoat Operations (EPA 453/R-08-002, 09/08). Also, Control of Volatile Organic Emissions from Existing Stationary Sources – Volume II: Surface Coatings of Cans, Coils, Paper, Fabric, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 05/77)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Dry Cleaning (Petroleum)	Control of VOC Emissions from Large Petroleum Dry Cleaners (EPA-450/3-82-009, 09/82). New Source Performance Standards for Petroleum Dry Cleaners (40 CFR 60 Subpart JJJ, 10/00)	Rule 227, Petroleum Dry Cleaning Operations (02/05/91); rescinded 04/12/12	No Major or Minor exceeding CTG thresholds or that require District Permit		Negative declaration to be adopted. There are no sources for this category in the District. The previously existing Rule was rescinded. Rule 227 was not SIP approved and the District has no large petroleum dry cleaners that would be covered by the CTG for Large Petroleum Dry Cleaners, therefore the District does not need a RACT rule for this category. The NSPS for Petroleum Dry Cleaners, 40 CFR 60 Subpart JJJ exempts dry cleaners which have a capacity of less than 84 pounds per load. This 84 pound size is considered the definition of “large” relative to the CTG.
Fiberglass Boat Manufacturing	Control Technique Guidelines for Fiberglass Boat Manufacturing Materials (EPA 453/R-08-004, 09/08)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Flexible Package Printing	Control Technique Guidelines for Flexible Package Printing (EPA-453/R-06-003, 09/06)		None		Negative declaration to be adopted. There are no sources for this category in the District.

Table 3. CTG/ACT Source Categories for Which a Negative Declaration is Required

Source Category	RACT Guidance Document -- Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
Large Appliances Surface Coatings	Control Technique Guidelines for Large Appliance Coatings (EPA 450/2-77-034, 12/77); Control Technique Guidelines for Large Appliance Coatings (EPA 453/R-07-004, 09/07); NESHAP Subpart NNNN, Large Appliances (7/23/02)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Magnet Wire	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); Control of Volatile Organic Emissions from Existing Stationary Sources, Volume IV: Surface Coating of		None		Negative declaration to be adopted. There are no sources for this category in the District.
Metal Furniture Coatings	Control of Volatile Organic Emissions from Existing Stationary Sources (EPA-450/2-77-032, 12/77); Control Techniques Guidelines for Metal Furniture Coatings (EPA-453/R-07-005, 09/07); NESHAP Subpart RRRR, Metal Furniture (05/23/03)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Natural Gas / Gasoline Processing	Control of VOC Equipment Leaks from Natural Gas / Gasoline Processing Plants (EPA-450/3-83-007, 12/83)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Oil and Natural Gas	Control Technique Guidelines for the Oil and Gas Industry (EPA 453/B16-001, 10/16)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Paper and Fabric	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume II: Surface Coatings of Cans, Coils, Paper, Fabric, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 05/77)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Paper, Film, and Foil Coatings	Control Techniques Guidelines for Paper, Film, and Foil Coatings (EPA-453/R-07-003, 09/07)	230, Plastic Products and Materials – Paper Treating Operations (06/28/94); rescinded 4/12/12	None	59 FR 64336 (12/14/1994), for Rule 06/28/94.	Negative declaration to be adopted. Rule 230 was rescinded 4/12/12. The only source, Formica, is shutdown (06/29/07).
Pharmaceutical Products	Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products (EPA-450/2-78-029, 12/78)		None		Negative declaration to be adopted. There are no sources for this category in the District.

Table 3. CTG/ACT Source Categories for Which a Negative Declaration is Required

Source Category	RACT Guidance Document -- Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
Polyester Resins Manufacturing	Control of VOC Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment (EPA-450/3-83-006, 03/84); Control of VOC Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins (EPA-450/3-83-008, 11/83); NESHAP Subpart FFFF, Misc. Organic Chemical Production and Processes (MON) (11/10/03)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Refineries	Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds (EPA-450/2-77-025, 10/77); Control of VOC Leaks from Petroleum Refinery Equipment (EPA-450/2-78-036, 06/78)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Rubber Tire	Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires (EPA-450/2-78-030, 12/78)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Ships/Marine Coating	Control Technique Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating) (61 FR 44050, 08/27/96 ); Alternative Control Technology Document – Surface Coating Operations at Shipbuilding and Ship Repair Facilities (EPA-453/R-94-032, 04/94); NESHAP Subpart II, Shipbuilding and Ship Repair (surface coating) (12/16/96)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Synthetic Organic Chemicals	Control of VOC Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry (EPA-450/3-84-015, 12/84); Control of VOC Emissions from Reactor Processes and Distillation Operations in SOCOMI (EPA-450/4-91-031, 08/93); Control of VOC Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment (EPA-450/3-83-006, 03/84);		None		Negative declaration to be adopted. There are no sources for this category in the District.
Wood Furniture Manufacturing Operations	Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations (EPA-453/R-96-007, 04/1994)	Rule 236 Wood Products Coating Operations, adopted 11/3/94, last amended 10/14/2010.	No Major or Minor exceeding CTG thresholds		Negative declaration to be adopted. The CTG applicability threshold is 25 tons/year for sources in moderate, serious, or severe non-attainment areas, and the potential VOC emissions from existing sources in the District are less than 25 tons/year.
<b>Source Categories with ACT and Other RACT Guidance (not CTGs)</b>					
Bakery Ovens	Alternative Control Technology Document – Bakery Ovens (EPA-453/R-92-017, 12/92)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.

Table 3. CTG/ACT Source Categories for Which a Negative Declaration is Required

Source Category	RACT Guidance Document -- Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
Cement Kilns	NOx Emissions from Cement Manufacturing (EPA-453/R-94-004, 03/94)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Chemical Plants	Control Techniques for Fugitive VOC Emissions from Chemical Process Facilities (EPA-625/R-93-005, 03/94)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Ethylene Oxide	Alternative Control Technology Document – Ethylene Oxide Sterilization / Fumigation Operations (EPA-450/3-89-007, 03/89)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Glass Furnaces	NOx Emissions from Glass Manufacturing (EPA-453-R-94-037, 01/93)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Ink and Paint Manufacture	Control of VOC Emissions from Ink and Paint Manufacturing Processes (EPA-450/3-92-013, 04/92)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Iron and Steel	NOx Emissions from Iron and Steel Mills (EPA-453/R-94-065, 09/94)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Leather and Tanning	Air Emissions and Control Technology for Leather Tanning and Finishing Operations (EPA-453/R-93-025, 06/93)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Nitric and Adipic Acid	NOx Emissions from Nitric and Adipic Acid Manufacturing (EPA-453/3-91-026, 12/91)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Organic Waste Process Vents	Alternative Control Technology Document - Organic Waste Process Vents (EPA-450/3-91-007, 1990/12)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Pesticides	Control of VOC Emissions from the Application of Agricultural Pesticides (EPA-453/R-92-011, 03/93)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Plywood Veneer Dryers	Control Techniques for Organic Emissions from Plywood Veneer Dryers (EPA-450/3-83-012)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Polymeric Foam Product Manufacturing	Control of VOC Emissions from Polystyrene Foam Manufacturing (EPA-450/3-90-020, 09/90)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Wastewater	Control of VOC Emissions from Industrial Wastewater (EPA-453/D-93-056, 09/92)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.



Table 3. CTG/ACT Source Categories for Which a Negative Declaration is Required

Source Category	RACT Guidance Document -- Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
Major VOC sources	N/A		None		There are no major VOC sources in the District that emit or have the potential to emit at least 25 tpy.

Table 4  
Every Feasible Measure

Table 4. Every Feasible Measure (EFM)

Source Category	CARB -- Every Feasible Control Measure (EFM)	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet EFM
Adhesives	SMAQMD Rule 460 (11/30/00); SJUAPCD Rule 4653 (09/16/10); BAAQMD Reg. 8, Rule 51 (12/02/09); SCAQMD Rule 1168 (01/07/05); SDCAPCD Rule 67.21 (05/14/08); YSAQMD Rule R2-33 (05/14/08); CARB-Reasonably Available Control Technology (RACT) (1998)	Rule 235, <u>Adhesives</u> (10/11/12)	Minor	Approved 78 FR 53711 8/30/13, effective 10/29/13	None. Comparable to rules of other districts in the region.
Aerospace Coatings	SCAQMD Rule 1124 (12/13/96); SDCAPCD Rule 67.9 0 (04/30/97)		No Major or Minor		All of these sources in the District in this subcategory are small. It is unlikely that a prohibitory rule would provide significant emission reductions and would likely be cost prohibitive.
Architectural Coatings	CARB Suggested Control Measure (SCM) (2007); SCAQMD Rule 1113 (07/13/07)	Rule 218, <u>Architectural Coatings</u> (10/14/10)	Minor	76 FR 75795 12/5/11, effective 2/3/12 (10/11/12)	None. Comparable to rules of other districts in the region.
Automotive Refinishing	CARB Suggested Control Measure (SCM) (10/05); SCAQMD Rule 1151 (12/02/05)	Rule 234, <u>Automotive Refinishing</u> (10/14/10)	Minor		None. Comparable to rules of other districts in the region.
Bakery Ovens	SMAQMD Rule 458 (09/05/96); SJUAPCD Rule 4693 (05/16/02); BAAQMD Reg. 8, Rule 42 (06/01/94); SCAQMD Rule 1153 (01/13/95); SDCAPCD Rule 67.24 (05/15/96)		None		There are no sources subject to this source category in the District.
Fugitive Emissions from Chemical Plants	BAAQMD Reg. 8, Rules 22 (06/01/94), 28 (06/15/94), 18 (01/07/98)		None		There are no sources subject to this source category in the District.

Table 4. Every Feasible Measure (EFM)

Source Category	CARB -- Every Feasible Control Measure (EFM)	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet EFM
Fugitive Emissions from Oil and Gas Production	RACT Determination of Fugitive Emissions of Fugitive Emissions of VOCs from Oil and Gas Production and Processing; Facilities, Refineries, Chemical Plants, and Pipeline Transfer Stations (12/08/93)		None		There are no sources subject to this source category in the District.
Fugitive Emissions from Petroleum Refineries	BAAQMD Reg. 8, Rules 28 (06/15/94), 18 (01/07/98)		None		There are no sources subject to this source category in the District.
Gasoline Terminals and Bulk Plants	SMAQMD Rules 446 (11/16/93), 447 (04/02/98); SJUAPCD Rules 4621 (12/20/07), 4623 (05/19/05); BAAQMD Reg. 8, Rules 33 (4/15/09), 39 (04/15/09), 5 (10/12/06); SCAQMD Rules 462 (05/14/99), 463 (05/06/08); SDCAPCD Rules 61.1 (07/26/00), 61.2 (07/26/00), 61.3 (10/16/03), 61.3.1 (03/01/06), 61.8 (01/13/87).1, 61.4.1 (03/26/08); YSAQMD Rules R2-13 (05/25/94), R2-21 (09/14/05)	Rule 215, <u>Transfer of Gasoline into Tank Trucks, Trailers, and Railroad Tank Cars at Loading Facilities</u> (06/19/97)	Minor	76 FR 5277 01/31/11 (06/19/97)	None. Comparable to rules of other districts in the region.
Graphic Arts, Lithographic and Letterpress Printing	SMAQMD Rule 450 (10/23/08); SJUAPCD Rule 4607 (12/08/08); BAAQMD Reg. 8, Rule 20 (11/19/08); SCAQMD Rules 1130 (10/8/99); SDCAPCD Rule 67.16 (05/15/96)	239, <u>Graphic Arts Operations</u> (10/11/12)	Minor	63 FR 63410 11/13/98 (02/13/97)	None. Comparable to rules of other districts in the region.

Table 4. Every Feasible Measure (EFM)

Source Category	CARB -- Every Feasible Control Measure (EFM)	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet EFM
Industrial Boilers ≥ 5 million Btu/hr	SMAQMD Rule 411 (03/25/10); SJUAPCD Rules 4305 (08/21/03), 4306 (10/16/08); BAAQMD Reg. 9, Rule 7 (07/30/08); SDCAPCD Rules 69 (12/12/95), 69.2 (09/27/94); YSAQMD Rule R2-27 (08/14/96); CARB - RACT and Best Available Retrofit Control Technology (BARCT) for Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (07/18/91)	Rule 231, <u>Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters</u> (10/09/97)	Minor	76 FR 67366 11/1/11, effective 1/3/12 (10/09/97)	None. Comparable to rules of other districts in the region.
Large Water Heaters and Small Boilers < 2 million Btu/hr	SCAQMD Rule 1146.1 (5/13/94) and 1146.2 (05/05/06); SMAQMD Rule 411 (8/23/07) and 414 (8/1/96); SJUAPCD Rule 4307 (5/19/11) and 4308 (12/17/09); BAAQMD Reg. 9, Rule 6 (11/7/07) and Rule 7 (9/16/92); YSAQMD Rule 2.37 (4/8/09)	Rule 246, <u>Natural Gas Fired Water Heaters</u> (06/19/97)	Minor	76 FR 67366 11/1/11, effective 1/3/12 (06/19/97)	Rule 246 applies to natural gas water heater < 750,000 Btu/hr and is consistent with the rules of other districts in the region.
		Rule 247, <u>Natural Gas-Fired Water Heaters, Small Boilers, and Process Heaters</u> (10/10/13)	Minor		Rule 247 applies to new boilers and water heaters within the heat input range of 75,000 to 5 million Btu/hr, and is consistent with the rules of other districts in the region.
Marine Coatings	SCAQMD Rule 1106 (01/13/95); NESHAP 60 FR 64330 (12/15/95)		None		There are no sources subject to this source category in the District.
Metal Parts and Products (Non-Architectural)	SMAQMD Rule 451 (09/25/2008); SJUAPCD Rule 4603 (09/17/09); BAAQMD Reg. 8, Rule 19 (10/16/02); SCAQMD Rule 1107 (01/06/06); SDCAPCD Rule 67.3 (04/9/03); YSAQMD Rule R2-25 (05/14/08)	Rule 245, <u>Surface Coating of Metal Parts and Products</u> (08/20/09)	Minor		None. Comparable to rules of other districts in the region.
Pleasure Craft Coating Operations	SCAQMD Rule 1106.1 (02/12/99)		None		There are no sources subject to this source category in the District.

Table 4. Every Feasible Measure (EFM)

Source Category	CARB -- Every Feasible Control Measure (EFM)	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet EFM
Polyester Resin Operations	SMAQMD Rule 465 (09/25/08); SJUAPCD Rule 4684 (09/17/09); BAAQMD Reg. 8, Rule 50 (12/2/09); SCAQMD Rule 1162 (07/08/05); SDCAPCD Rule 67.12 (05/15/96); YSAQMD Rule R2-30 (05/14/08)	Rule 243, <u>Polyester Resin Operations</u> (04/10/03)	Minor		None. Comparable to rules of other districts in the region.
Polymeric Foam Product Manufacturing	SJUAPCD Rule 4682 (09/20/07); SDCAPCD (05/15/96); SCAQMD Rule 1175 (09/07/07)		None		There are no sources subject to this source category in the District.
Portland Cement Kilns	SCAQMD Rule 1112 (06/06/86)		None		There are no sources subject to this source category in the District.
Refinery Boilers	SCAQMD 1109 (08/05/88) BAAQMD Reg. 9 Rule 10 (01/05/94)		None		There are no sources subject to this source category in the District.
Restaurants, Chain Driven Charbroilers	SJUAPCD Rule 4692 (9/17/09); SCAQMD Rule 1138 (11/14/97)		Minor		All of these sources in the District in this subcategory are small. It is unlikely that a prohibitory rule would provide significant emission reductions and would likely be cost prohibitive.
Semiconductor Manufacturing	BAAQMD Reg. 8, Rule 30 (6/15/94); SCAQMD Rule 1164 (1/13/95); VCAPCD Rule 74.21(4/6/93)	Rule 244, <u>Semiconductor Operations</u> (02/09/95)	Minor	61 FR 38571 07/25/96 (02/09/95)	None. Comparable to rules of other districts in the region.
Small Industrial Boilers (1 million Btu/hr to 5 million Btu/hr)	SMAQMD Rule 414 (08/23/07); SJUAPCD Rules 4307(10/16/08); 4308 (12/17/09)	Rule 247, <u>Natural Gas-Fired Water Heaters, Small Boilers, and Process Heaters</u> (10/10/13)	Minor		None. Addressed above.

Table 4. Every Feasible Measure (EFM)

Source Category	CARB -- Every Feasible Control Measure (EFM)	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet EFM
Solvent Cleaning	SMAQMD Rule 466 (09/25/08); SJUAPCD Rules 4663 (09/20/07), 4461 (09/20/07); BAAQMD Reg.8, Rule 16 (10/16/02); SCAQMD Rules 1122 (05/1/09), 1171 (05/1/09); SDCAPCD Rule 67.6.1 (05/23/07)	216, <u>Organic Solvent Cleaning and Degreasing</u> (12/11/03); 240, Surface Preparation and Cleanup (12/11/03)	Minor	75 FR 24406 05/05/10 (12/11/03)	None. The District rule VOC solvent limit of 50 g/L is higher than the 25 g/L limit of some other regional Districts, however, going to the more stringent limit has been determined to be not cost effective and provide very small emission reductions.
Surface Coating of Plastic Parts and Products	BAAQMD Reg. 8, Rule 31 (10/16/02); SCAQMD Rule 1145 (12/04/09)	Rule 249, <u>Surface Coating of Plastic Parts and Products</u> (08/08/13)	Minor		None. Comparable to rules of other districts in the region.

ATTACHMENT 1

RACT Evaluation of Existing District Rules



## Attachment 1

### RACT Evaluation of Existing District Rules

#### **Adhesives**

District Rule 235, Adhesives, was amended on 10/11/12 to meet the EPA's 2008 CTG and consideration of the rules of other districts in the region (Sacramento, Yolo-Solano, Feather River, and El Dorado). It was reviewed and approved by CARB, and reviewed and approved into the SIP by EPA on 08/30/13. The CTG has not been updated since it was last amended. We have recently determined that its VOC limits are similar to those of current Sacramento Rule 460 and Yolo-Solano Rule 2.33, see comparison in Table 1-1.

#### **Boilers, Biomass**

District Rule 233, Biomass Boilers, was amended on 06/14/12 to meet more stringent NOx emission levels currently achieved in practice at existing biomass boilers using Selective Non-Catalytic Reduction (SNCR) for NOx control. Its NOx limit (115 ppmv NOx at 12% CO<sub>2</sub> on a three hour rolling average compliance period) is comparable to other regional District rules. San Joaquin Valley Rule 4352 and Yolo-Solano Rule 2.43. Both have limits of 90 ppmv at 3% O<sub>2</sub> on a twenty-four hour block average compliance period. These limits are lower, however, they are not directly comparable because they allow a much longer compliance averaging period of 24 hours and on 24 hour blocks, not rolling. PCAPCD District Rule 233 has a much shorter rolling averaging period of 3 hours updated after each new one hour. It effectively prevents short term emission spikes by requiring short and frequent compliance average checks. District Rule 233 is identical to El Dorado Rule 232.. It is much more stringent than EPA ACT guidance.

Rule 233's NOx limit is based on the use of SNCR -- involving injection of ammonia or urea into the post combustion exhaust gases at a temperature of 1,500F -- and has been determined to be cost effective. SNCR is in use at both of the major source biomass boilers operating in the District that are subject to this rule. The District has determined that potential improved NOx control using Selective Catalytic Reduction -- involving the reheating of exhaust gases following particulate matter control and use of ammonia over a precious metal reduction catalyst -- would be cost prohibitive and has not been comprehensively demonstrated on a long term basis in practice. The two major source biomass boilers operating in the District have lower (more stringent) federal title V permit NOx limits of 91 ppmv on a 3 hour average. District Rule 233 was reviewed and approved by CARB, and reviewed and approved into the SIP by EPA on 08/29/13.

#### **Boilers, Water Heaters > 5 MMBtu/hr**

The District is not required to meet RACT for this source category because we do not have any major sources of this type category. Nonetheless, for ozone attainment SIP planning, District Rule 231, Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters, was originally adopted on 10/17/94, last amended on 10/09/97, and incorporated into the SIP on 11/01/11. It is more stringent than EPA ACT guidance. It is comparable to rules of some other districts in the region (Yolo-Solano, El Dorado, and Feather River). Sacramento Air Quality Management District Rule 411 has more stringent NOx limits for gas-fired boilers. We will consider including these lower limits in upcoming regional ozone attainment plan commitments.

#### **Cutback Asphalt**

District Rule 217, Cutback and Emulsified Asphalt Paving Materials, was amended on 10/19/93 and approved into the SIP by EPA on 04/30/97. Subsequent EPA comments, in a letter dated 10/10/06, on the District's 2006 RACT SIP indicate that Rule 217 meets the CTG, however recommends considering banning the use of cutback asphalt during the ozone season as done by several midwestern states, and replacing the use of cutback asphalt with emulsified asphalt as promoted by the CTG.

The South Coast Air Quality Management District (SCAQMD) has since concluded that, based on the definitions in their cutback asphalt Rule 1108, replacement of cutback asphalt with emulsified asphalt would actually potentially increase VOC emissions. This is because cutback asphalt has a 0.5% organic compound limit, whereas emulsified asphalt has a 3% organic compound limit.

District Rule 217 has the same basic organic content limits as SCAQMD Rule 1108. For slow-cure, Rule 217 allows 0% of organic compounds that evaporate at less than 500°F, less than the SCAQMD limit of 0.5%. For medium-cure, Rule 217 has an exemption that allows use only on days when the maximum temperature will not exceed 50°F; however, 50°F days do not occur during the ozone season. Use of fast-cure asphalt is prohibited at all times. Further, like SCAQMD, District Rule 217 limits emulsified asphalt to 3% organic compounds.

Thus, District Rule 217 meets RACT. The rule effectively prohibits the use of cutback asphalt containing VOCs during the ozone season -- because during the ozone season only the use of slow-cure cutback asphalt is allowed. Banning the use of cutback asphalt would reduce VOC emissions only during periods outside of the ozone season.

### **Flat Wood Paneling Coatings**

District Rule 238, Factory Coating of Flat Wood Paneling, was amended on 10/14/10 to meet EPA's 2006 CTG and consideration of the rules of other districts in the region. It was reviewed and approved by CARB, and reviewed and approved into the SIP by EPA on 11/21/11. The CTG has not been amended since the last District rule amendment. The District has one facility, Pacific MDF, that operates under this source category.

### **Gas Turbines**

District Rule 250, Stationary Gas Turbines, was amended on 10/08/15 and SIP approved by EPA on 08/01/16. The amendment addressed EPA concerns during their 2014 RACT SIP review by adding startup and shutdown provisions and removing the % efficiency compliance options. The rule is consistent with the only other regional air district rule (Sacramento Rule 413) and EPA NSPS and ACT guidance for peaker and prime use turbines.

The rule is applicable to two District sources -- a limited low use peaker turbine and a base load combine cycle prime turbine plant:

- Roseville Electric operates two peaker simple cycle natural gas/fuel oil fired turbines, each at 25 MW capacity. Water injection is used for NOx control. Operations began in 1987. District permits limit combined turbine operating hours to less than 900 unit-hours per year and 25 unit-hours per day. District permits limit NOx emissions to 42 ppmv @ 15% O<sub>2</sub> on natural gas and 62 ppmv @ 15% O<sub>2</sub> on fuel oil. Actual measured NOx emissions are less than 30 ppmv. The turbines have never fired, and never will fire, fuel oil. Actual combined turbine operating time is consistently (always) less than 150 hours/year and usually less than 50 hours/year.
- Roseville Electric operates two combined cycle natural gas fired turbines (each at 60 MW, 80 MW maximum capacity with duct burners firing). Selective catalytic reduction and oxidation catalysts are used for NOx and CO control. Operations began in September 2007. They operate under an EPA reviewed and approved Title V permit. The federally enforceable Title V permit limits NOx emission to 2 ppmv @ 15% O<sub>2</sub> on a 1-hour average, VOC at 2 ppmv @ 15% O<sub>2</sub> on a 1-hour average, and CO at 4 ppmv @ 15% O<sub>2</sub> on a 3-hour average. These levels are representative of Best Available Control Technology, and are significantly more stringent than EPA ACT or rules of other districts in the region for existing sources. The operation uses (as required by District permit) Continuous Emissions Monitoring System (CEMS) to measure NOx and CO; and is required to conduct annual source testing to confirm NOx and CO plant emissions and relative accuracy of the CEMS.

### **Gasoline Bulk Plants and Terminals**

District Rule 215, Transfer of Gasoline into Tanks Trucks, Trailers, and Railroad Tanks Cars at Loading Facilities, was last amended on 06/19/97, and approved in the SIP by EPA on 01/31/11. It requires vapor control systems be certified by CARB. It meets EPA CTG and NESHAPs. Rule control requirements are consistent with the rules of other districts in the region, including Sacramento Rule 447 and Yolo-Solano Rule 221.

## **Gasoline Service Stations**

District Rule 213, Gasoline Transfer into Stationary Storage Containers, meets CARB Phase I Enhanced Vapor Recovery requirements (>98% VOC controls for underground tanks and >95% control for most aboveground tanks) and is fully consistent with EPA CTG and the rules of other districts in the region. It was included in the SIP by EPA on 04/30/97.

District Rule 214, Transfer of Gasoline into Vehicle Fuel Tanks, meets CARB Phase II Enhanced Vapor Recovery requirements (>95% VOC controls) and are fully consistent with EPA CTG and the rules of other districts in the region. It was amended on 02/21/13, and approved by CARB adopted into the SIP EPA on 02/10/15.

## **Graphic Arts**

District Rule 239, Graphic Arts, was amended on 10/11/12 to meet the EPA's 2006 CTG and consideration of the rules of other districts in the region (Sacramento, Yolo-Solano, Feather River, and El Dorado). It was reviewed and approved by CARB, and reviewed and approved by EPA into the SIP on 03/13/14. We have recently determined that its VOC limits are similar to those of current Sacramento Rule 450 and Yolo-Solano Rule 2.29, see comparison in Table 1-2. At this time, the District has chosen solvent cleaner VOC limits that are consistent with the CTG and not to go with lower limits of Sacramento and Yolo because there would be added compliance cost with very small associated emission reductions.

## **Internal Combustion Engines (Stationary)**

The District is not required to meet RACT for this source category because there are no major sources of this type. Nonetheless, for ozone attainment SIP planning, District Rule 242, Stationary Internal Combustion Engines, was adopted on 04/10/03, which limits NOx for stationary engines greater than 50 HP, and was approved into the SIP by EPA on 11/01/11. The District is not likely to adopt any more stringent prohibitory NOx limit for this source category in the near future because: (1) we have very few prime engines (engines that are not restricted to low-use or emergency use) and those few prime engines that do exist have NOx levels based on recent Best Available Control Technology requirements; and (2) emergency engines have very little use.

## **Metal Coil, Container, and Closure**

District Rule 223, Metal Container Coating, was last amended on 10/06/94 and SIP approved by EPA on 03/23/95. Rule 223 meets the EPA CTG. There is one District source that operates under this rule – Industrial Container Services (Capital Drum), which coats reconditioned drums. For the drum coating VOC limits, Rule 223 is consistent with those of San Joaquin Valley Rule 4604 and Sacramento Rule 452, see Table 1-3. EPA has commented that the VOC limit for the end-sealing compound category does not meet RACT. The District has confirmed that this product-type is not used at Industrial Container Services, or any other location in the District that we are aware of.

## **Metal Parts Coating**

District Rule 245, Surface Coating of Metal Parts and Products, was amended on 08/20/09 to meet the EPA's 2008 CTG and consideration of the rules of other districts in the region. It was reviewed and approved by CARB, and reviewed and approved into the SIP by EPA on 05/24/11. We have recently determined that its VOC limits are similar to those of current Sacramento Rule 451 and Yolo-Solano Rule 2.25, see comparison in Table 1-4.

## **Plastic Parts Coating**

District Rule 249, Surface Coating of Plastic Parts and Products, was adopted on 08/08/13. It was based on EPA's 2008 CTG and considering the rules of other districts in the region. It has been reviewed and approved by CARB and SIP approved by EPA on 03/27/15. We have recently determined that its VOC limits are identical to those of current Sacramento Rule 468, see comparison in Table 1-5.

### **Polyester Resin Operations**

District Rule 243, Polyester Resin Operations, was adopted in 04/10/03, and incorporated into the SIP by EPA on 10/03/11. The rule applies to manufacturing of products from polyester resin gel coats. It does not apply to fiberglass boat manufacturing, which would be subject to the Fiberglass Boat Manufacturing Materials CTG, and does not apply to polyester resin manufacturing. This Rule, therefore, is not subject to RACT. The District does not have any fiberglass boat manufacturing facilities, and does not have any polyester resin manufacturing operation, and does not have any operations that use polyester resins that emit or have the potential to emit more than 25 tons/yr of VOCs. The Rule meets CARB BARCT guidance (01/08/91).

### **Solvent Cleaning**

District Rule 240, Surface Preparation and Cleanup, and District Rule 216, Organic Solvent Cleaning and Degreasing Operations, control VOCs from the use of solvents for cleaning, where not otherwise addressed in separate source category prohibitory rules. The District rules all meet the EPA 2006 CTG, with a VOC content limit of 50 g/L; and a number of the individual source category rules have a solvent cleaning VOC content limit of 25 g/L.

District Rule 240 was approved into the SIP by EPA on 03/13/14. Rule 216 was approved into the SIP by EPA on 05/05/10.

District Rule 240 and 216 limit solvent VOC limit to 50 g/L and do not meet the more stringent VOC limit of 25 g/L which have been recently adopted by other regional districts (Sacramento, Yolo-Solano, and Feather River) as part of their ozone attainment plan commitments. The District will consider moving to the 25 g/L limit as part of our upcoming regional ozone attainment planning. The District does not consider the general solvent cleaners VOC limit of 25 g/L to currently be cost effective or have a significant beneficial impact on reducing local ozone.

District Rule 216 Section 104.5 exempts solvent degreasing operations subject to CFR Part 63 Subpart T. The CTG does not allow this exemption. The District is not aware of any solvent decreasing operations that qualify for this exemption. None the less, the District commits to removing this section exemption in a rule amendment in the upcoming year.

### **Tanks, Storage Petroleum Liquids**

District Rule 212, Storage of Organic Liquids, was amended on 06/19/97, and incorporated into the SIP on 06/11/09. It meets all EPA CTG, NSPS, and ACTs. The control requirements and tank seal inspection and record keeping and report requirements are consistent with the rules of other districts in the region, including Sacramento Rule 446 and Yolo-Solano Rule 2.21. The District has one facility, a gasoline and transmix tank farm operated by Kinder Morgan SantaFe Pacific, under this source category.

### **Wood Furniture Coating**

District Rule 236, Wood Products Coating Operations, was amended on 10/14/10 to be consistent with the EPA CTG and consideration of the rules of other districts in the region. It was reviewed and approved by CARB, and reviewed and approved into the SIP by EPA on 11/21/11. We have recently determined that its VOC limits are similar to those of current Sacramento Rule 463, Yolo-Solano Rule 2.39, and Feather River Rule 3.20, see comparison in Table 1-6. Additionally, Placer does not have any source which exceed the 25 tpy CTG applicability threshold, therefore, the District intends to adopt a negative declaration for this source category. Wood coating operations in the District, with VOC emissions shown, include:

Wood Coater VOC Emissions

Facility	VOC Emissions (tons/yr)		
	2017	2018	2019
Allen's Cabinets	0.00	0.00	0.00
Cabinet Mill	0.17	0.12	na
Color Custom Creations	1.64	1.82	na
Freedom Industrial Coatings	0.40	0.43	na
Furniture Menders	na	2.88	na
Highmark Digital	0.46	0.75	na
Jeld-Wen	5.97	8.05	na
Pacific MDF	6.99	8.11	6.80

na: Data not collected yet

**EPA MACT/NESHAPS**

In our RACT analyses, the District has considered recent EPA Maximum Achievable Control Technology (MACT) rulemakings concerning the control of hazardous air pollutants (HAPs) from applicable District source categories. These include:

- Autobody Refinishing (Subpart HHHHHH)
- Dry Cleaning (Subpart M)
- Miscellaneous Metal Parts and Products (Subpart MMMM)
- Metal Can (Subpart KKKK), and Plastic Parts (Subpart PPPP)

Work practices appropriate for the control of both VOC and HAPs have been directly considered, and incorporated as possible. Because many HAPs are exempt VOCs for ozone regulation (i.e., are not photochemically reactive and do not produce ozone) and many VOCs are not HAPs, it is not possible to directly compare or utilize MACT HAP limits with RACT VOC limits. Further, MACT HAP limits are fully and directly evaluated and considered in case-by-case individual source permits.

Table 1-1. Adhesives

Coating Category	VOC Limit (g/L)		
	Placer Rule 235	Sac Metro Rule 460	Yolo-Solano Rule 2.33
Multipurpose Construction	200	200	200
Ceramic Tile	130	130	130
Cove Base	150	150	150
Dry Wall and/or Panel	50		
Flooring:			
Outdoor Floor Covering	250	250	250
Indoor Floor Covering	150	150	150
Ceramic Tile	130	130	130
Indoor Carpet or Carpet Pad	150		
Rubber Flooring	150		
Perimeter Bonded Sheet Vinyl Flooring	660	660	660
Subfloor	50		
VCT and Asphalt Tile	50		
Roofing:			
Single-Ply Roof Membrane	250	250	250
Non-Membrane Roof	300	300	300
Structural Glazing	100	100	100
Structural Wood Member Glazing	140		
Plastic Welding:			
ABS Welding	400	400	400
CPVC Welding	490	490	490
Plastic Cement Welding Primer	510	510	
Other Plastic Cement Welding Primer	400		450
Other Plastic Cement Welding	450	450	
Speciality:			
Contact Adhesive Including Speciality Substrate	200	250	250
Rubber Vulcanization Bonding	850		
Tire Retread	100	100	100
Motor Vehicle	250		
Motor Vehicle Weather Strip	750		
Top and Trim	540		540
Thin Metal Laminating	780	780	780
Computer Diskette Jacket Manufacturing	850	850	850
Metal to Urethane/Rubber Molding or Casting	250	250	250
Waterproof Resorcinol Glue	170	170	170
Adhesive Primers:			
Automotive Glass	700	700	700
Single Ply-Roof Membrane	250	250	250
Traffic Marking Tape	150	150	150
Other	250	250	250
Plastic Cement Welding			550
Sealants:			
Architectural	250	250	250
Marine Deck	760	760	760
Non-Membrane Roof	300	300	300
Roadway	250	250	250
Single-Ply Roof Membrane	450	450	450
Other	420	420	420
Sealant Primers:			
Architectural-Non-Porous	250	250	250
Architectural-Porous	775	775	775
Marine Deck	760	760	760
Other	750	750	750

VOC Content Limits for Adhesive Applications Onto Substrates			
Flexible Vinyl	250	250	250
Fiberglass	200	200	200
Metal to Urethane/Rubber Molding or Casting	30	30	30
Porous Material (Except Wood)	120	120	120
Plastic Foam	80		
Wood	30		
Reinforced Plastic Composite	200		
Rubber	250	250	
Other	250	250	250
VOC Content Limits for Aerosol Adhesives			
Adhesives--Aerosol:			
Mist Spray Adhesives	65%	65%	
Web Spray Adhesives	55%	55%	
Special Purpose Spray Adhesives:			
Mounting, Automotive Engine Compartment, and Flexible Vinyl Adhesives	70%	70%	
Polystyrene Foam and Automobile Headliner Adhesives	65%	65%	
Polyolefin and Laminate Repair/Edgebanding Adhesives	60%	60%	
VOC Content Limits for Surface Preparation, Cleanup and Stripper Solvents			
Substrate Preparation			Rule 2.31
Single Ply-Roof Membrane Installation/Repair	45 mm Hg	250	
Electrical Apparatus Components and Electronic Components	500	900	100
Medical Devices and Pharmaceuticals	800	900	800
Other Substrates	70	70	25
Product Cleaning During Manufacturing Process or Surface Preparation for Adhesive Application			
General			25
Surface Preparation Prior to Rubber Vulcanization Process			
Repair and Maintenance Cleaning			25
Cleanup			
Application Equipment:			
Spray Gun in an Enclosed Gun Cleaner	45 mm Hg	45	
Soaking in a Closed Container	9.5 mm Hg	9.5	
Other	70	70	25
Other (Not Application Equipment)	45 mm Hg		
Cleaning of Adhesive Application Equipment			
Solvent Stripping Activity			
Wood Substrates	350	350	
Other	9.5 mm Hg		

Table 1-2. Graphic arts

	Placer Rule 239	Sac Metro Rule 468	Yolo-Solano Rule 2.29
<b>VOC Content for Inks, Coatings, and Adhesives</b>			
<b>Material Type</b>	<b>VOC Limit (g/L)</b>		
<b>General:</b>			
Printing Ink	300	300	300
Adhesive	150	150	150
Coating	300	300	300
<b>Screen Printing:</b>			
Printing Ink	400	400	400
Adhesive	150	150	150
Coating	400	400	400
Electronic Circuit	800	800	
Extreme Performance Ink/Coating	400	800	400
Metallic Ink	400	400	400
Sign Ink/Coating	400	500	400
Mechanically Formed Products	800	800	
Overlays	800	800	
Web-Fed Wallpaper	300	300	
Water Slide Decals	800	800	
Resists			600
<b>VOC Content for Fountain Solution Materials</b>			
<b>Material Type</b>	<b>% By Weight</b>		
<b>Heatset Web Offset Lithographic:</b>			
<b>Containing Alcohol:</b>			
Chilled Using Refrigerator Chiller	3	3	3
Non-Chilled	1.6	1.6	1.6
Containing No Alcohol	5	5	5
Coldset Web Offset Lithographic	5	5	5
<b>Sheet-fed Offset Lithographic (w/max sheet size greater than 11x17"):</b>			
Containing Alcohol and Chilled Using Refrigerator Chiller	8.5	8.5	8.5
Other	5	5	5
<b>All Other Presses:</b>			
Chilled Using Refrigerator Chiller	10	10	10
Non-Chilled	8	8	8
<b>VOC Content of Solvent Cleaning Materials</b>			
<b>Material Type</b>	<b>VOC Limit (g/L)</b>		
General (e.g. maintenance, repair, solvent, wipe) Cleaning	72	25	25
<b>Application Equipment Cleaning:</b>			
General (not specifically listed below)	100	25	25
Lithographic and Letter Press Printing, Blanket and Roller Washes and Other On-Press Components	300	100	238
Lithographic and Letter Press Printing, Other Cleaning	300	100	
Screen Printing	300	300	100
Flexographic Printing	100	100	25
Specialty Flexographic Printing	670	100	100
Ultraviolet Inks (except Screen Printing)	670	100	100



Table 1-3. Metal containers coating

Material Type	VOC Limit (g/L as applied)		
	Placer Rule 223	Sac Metro Rule 452	San Joaquin Rule 4604
Sheet Basecoat (Interior and Exterior) and Over-varnish	225	225	225
Two Piece Can Exterior Basecoat and Over-varnish	250	250	250
Coil Coating	200		200
Interior Body Spray:			
Two Piece Can	420	420	420
Three Piece Can	360	360	360
Three Piece Can Side Seam Spray	660	660	660
End Sealing Compound:			
Food/Beverage	440	20	
Non-food/Non-beverage	0	0	
Exterior Body Spray	420		420
Two Piece Can Exterior End Coating		250	420
Reconditioned Drums, Pails, and Lids Coatings:			
Interior	510		420
Exterior	420		420
New Drums, Pails, and Lids Coatings:			
Exterior, Air Dried	340		340
Exterior, Baked	340		340
Interior	420		420
Inks	225		
Tab Press Lubricant	690		
Necker Lubricants	100		

Table 1-4. Metal parts and products coating

Coating or Material Type	Placer Rule 245		Sac Metro Rule 451		Yolo-Solano Rule 2.25	
	VOC Limit (g/L)					
	Baked	Air-Dried	Baked	Air-Dried	Baked	Air-Dried
General (One Component)	275	275				
General (Multi-Component)	275	340			275	240
Aluminum Coating for Window Frames and Door Frames			420	420		
Specialty Coatings						
Camouflage	360	420	360	420	360	420
Electric Insulating Varnish	420	420	275	340		
Etching Filler	420	420	420	420	420	420
Extreme Performance	360	420	420	420	420	420
Extreme High Gloss	360	340	360	420		
Heat Resistant	360	420	360	420	360	420
High Performance Architecture	420	420			420	420
High Temperature	420	420			420	420
Metallic and Iridescent Coating	360	420	420	420	360	420
Military Sepcification	274	340				
Mold Seal Coating	420	420			420	420
Pan Backing Coating	420	420			420	420
Pretreatment Wash Primer	275	340	420	420	420	420
Prefabricated Arichtectural	275	420	275	420		
Repair Coating	360	420				
Silicone Release Coating	420	420	420	420	420	420
Solar Absorbent Coating	360	420	360	420	360	420
Touch-Up Coating	360	420				
Vacuum Metalizing	420	420			420	420
All Other Coatings			275	340		
High Gloss					360	420

Table 1-5. Plastic parts coating

	Placer Rule 249	Sac Metro Rule 468
Material Type	VOC Limit (g/L)	
General One Component	275	
General Multi-Component	420	420
Specialty Coatings:		
Electric Dissipating and Shock-free	800	800
Extreme Performance (One-Component)		280
Extreme Performance (Two-Component)	420	420
Metallic	420	420
Military Specification (1 pack)	335	340
Military Specification (2 pack)	420	420
Mold Seal	755	760
Multi-colored	680	680
Optical	800	800
Vacuum Metalizing	800	800
All Other Coatings		280

Table 1-6. Wood products coating

Specific Material	VOC Limit (g/L)			
	Placer Rule 236	Feather River Rule 3.20	Sac Metro Rule 463	Yolo-Solano Rule 2.39
<b>New Wood Products</b>				
Clear Topcoats	275	275	275	275
Conversion Varnish	550	550	550	550
Filler	275	275	275	275
High-Solid Stain	350	350	350	350
Inks	500	500	500	500
Mold-Seal Coating	750	750	750	750
Multi-colored Coating	275	275	275	275
Pigmented Coating	275	275	275	275
Sealer	275	275	275	275
Low Solid Stains, Toners, and Washcoats	120	120	120	120
Surface Prep and Clean-up Solvents Containing VOC's	25	25	25	25
<b>Refinish, Repair Preserve or Restore</b>				
Clear Topcoats	680	680	680	680
Conversion Varnish	550	550	550	550
Filler	500	500	500	500
High-Solid Stain	700	700	700	700
Inks	500	500	500	500
Mold-Seal Coating	750	750	750	750
Multi-colored Coating	680	680	680	680
Pigmented Coating	600	600	600	600
Sealer	680	680	680	680
Low Solid Stains, Toners, and Washcoats	480	480	480	480
Surface Prep and Clean-up Solvents Containing VOC's	25	25	25	25