

**SACRAMENTO METROPOLITAN  
AIR QUALITY MANAGEMENT DISTRICT**

For Agenda of **October 27, 2011**

**To:** Board of Directors  
Sacramento Metropolitan Air Quality Management District

**From:** Larry Greene  
Executive Director/Air Pollution Control Officer

**Subject:** Adopt a Resolution Finding that the District Has No Sources Subject to the Control Techniques Guidelines for Coating Operations at Aerospace Manufacturing and Rework Operations.

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**Recommendations**

1. Conduct a public hearing, if requested by member of the public; and
  2. Adopt the attached resolution affirming that there are no sources within the District to which the Control Techniques Guideline applies.
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**Executive Summary**

The District is part of a severe nonattainment area for the federal 8-hour ozone standard. The federal Clean Air Act requires states and air districts that are in nonattainment areas to implement Reasonably Available Control Technology (RACT) for sources of emissions. In addition to other RACT requirements, RACT is required for all volatile organic compound (VOC) emission source categories for which the U.S. Environmental Protection Agency (EPA) has published a Control Techniques Guidelines (CTG) document. The District must submit to EPA either: 1) District rules that meet the RACT requirements, or 2) a finding that there are no sources in Sacramento County to which the CTG applies. EPA refers to the finding as a “negative declaration,” and that term is used below and in the resolution.

Staff analyzed the 1997 CTG document for Coating Operations at Aerospace Manufacturing and Rework Operations. As a result of this analysis, Staff has determined that there are no sources within the District to which this CTG applies, and there are no such sources anticipated in the future. Therefore, Staff is proposing to include a negative declaration for this CTG source category in the State Implementation Plan<sup>1</sup>.

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<sup>1</sup> 40 Code of Federal Regulations (CFR) 52.222.

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## Attachments

The table below identifies the attachments to this memo:

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## Background

The District is designated as a severe nonattainment area for the federal 8-hour ozone standard. The Federal Clean Air Act (CAA) specifies that State Implementation Plans (SIPs) for nonattainment areas classified as “moderate” or worse include Reasonably Available Control Technology (RACT) for sources of VOC emissions for each category of VOC sources covered by all Control Techniques Guidelines (CTG) documents issued after November 15, 1990, and prior to the area’s date of attainment<sup>2</sup>. EPA defines RACT as “the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility<sup>3</sup>.” EPA periodically publishes information regarding available controls. In developing CTG documents, EPA evaluates, among other things, the sources of VOC emissions and the available control approaches for addressing these emissions, including the costs of such approaches. CTG documents establish the presumptive minimum recommendations for RACT. Areas may deviate from CTG requirements, if justified.

As an alternative to adopting a RACT rule, a state or local agency may adopt a negative declaration documenting that it has no stationary sources or emitting facilities to which the CTG is applicable. The negative declaration is subject to a 30-day public review period.

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## STAFF’S ANALYSIS OF THE CTG

Staff analyzed the following CTG to determine whether it applies to any sources within the District:

*Guideline Series: Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations.* U.S. EPA Publication No. EPA-453/R-97-004, December 1997.

The CTG applies to facilities that emit 25 tons or more of VOC per year from the manufacture or rework of commercial, civil, or military aerospace vehicles or components. Staff reviewed District permit files to identify permitted facilities to which the CTG may apply. In addition, Staff

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<sup>2</sup> Clean Air Act §182(b)(2)(A).

<sup>3</sup> Federal Register Notice 44 FR 53761, September 17, 1979.

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reviewed the District's emissions inventory, searched yellow pages and online business listings, and placed calls to business that might perform aerospace manufacturing or repair to identify anticipated or unpermitted facilities to which the CTG may apply. Staff's analysis shows that there are no sources within the District to which the aerospace coating CTG applies. No aerospace manufacturing or rework operations large enough to exceed the CTG emissions threshold are anticipated in the future. Staff is proposing a negative declaration for this source category.

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**Business Cost Impacts**

No costs to businesses will be incurred as a result of the proposed negative declaration.

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**District Impacts**

The proposed SIP revision will not result in an additional need for Staff resources.

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**Emission Impacts**

The proposed SIP revision will not have any effect on emissions.

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**ENVIRONMENTAL COMPLIANCE**

Staff finds that the proposed rule is not subject to the California Environmental Quality Act because it is an activity that will not result in a direct or reasonably foreseeable indirect physical change in the environment<sup>4</sup>.

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**Public Outreach**

A public notice for the Board's consideration of the proposed negative declaration was issued on September 19, 2011, announcing that a public hearing has been tentatively scheduled for today's Board meeting. Consistent with federal regulations for public review of SIP revisions<sup>5</sup>, the notice stated that the public hearing will be cancelled if no member of the public requests within a 30-day period that the public hearing be held, and the public will be notified of a cancellation on October 20, 2011. In the event that the public hearing is cancelled, the negative declaration may be adopted by the Board without a hearing.

The noticing for today's meeting included:

- E-mail notices to approximately 2,500 recipients who have subscribed to electronic SIP notices, and to CARB and EPA;
- U.S. mail notices to all those who have requested them; and

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<sup>4</sup> Public Resources Code §21084(a) and Preliminary Review, State CEQ Guidelines §15060(c)(2).

<sup>5</sup> 40 CFR 51.102.

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- A notice posted on the District website. The notice included a link to the proposed negative declaration and staff report.
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**Conclusion**

There are no sources within the District to which the CTG for Coating Operations at Aerospace Manufacturing and Rework Operations applies. The proposed negative declaration will meet the District's RACT requirements under Section 182(b)(2)(A) of the federal Clean Air Act. Therefore, Staff recommends that the Board determine that the proposed negative declaration is exempt from CEQA and adopt the attached resolution approving the negative declaration.

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Respectfully submitted,

Approved as to form:

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Larry Greene  
Executive Director/Air Pollution Control Officer

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Kathrine Pittard  
District Counsel

Attachments