

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

For Agenda of **March 22, 2012**

To: Board of Directors
Sacramento Metropolitan Air Quality Management District

From: Larry Greene
Executive Director/Air Pollution Control Officer

Subject: Adopt Resolutions Finding that the District Has No Sources Subject to the Following Control Techniques Guidelines:

1. Automobile and Light-Duty Truck Assembly Coatings
2. Fiberglass Boat Manufacturing Materials

Recommendation

Adopt the attached resolutions affirming that there are no sources within the District to which the Control Techniques Guidelines apply.

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. After public review, 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 "negative declaration," and that term is used below and in the resolution.

Staff analyzed two 2008 CTG documents for Automobile and Light-Duty Truck Assembly Coatings, and Fiberglass Boat Manufacturing Materials. Several information sources, including online yellow pages, business listings, phone calls to businesses, and District permit files were used to determine whether any facilities would be subject to the CTGs. Staff has determined that there are no sources within the District to which these CTGs apply, and there are no such sources anticipated in the future. Therefore, Staff is proposing to include negative declarations for these CTG source categories in the State Implementation Plan¹.

¹ 40 Code of Federal Regulations (CFR) 52.222.

Attachments

The table below identifies the attachments to this memo:

Item	Attachment	Page #
Board Resolution for Negative Declaration – Automobile and Light-Duty Truck Assembly Coatings	A	4
Board Resolution for Negative Declaration – Fiberglass Boat Manufacturing Materials	B	7
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Environmental Review and Compliance

In adopting these negative declarations, the District is not adopting new requirements for emission sources. No source will need to change its operations to comply with a requirement. Staff finds that the adoption of these negative declarations 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 environment².

Public Outreach

A public notice for the proposed negative declarations was issued on January 19, 2012, to provide an opportunity for someone to identify potentially subject facilities. The notice also announced that a public hearing had been tentatively scheduled for February 23, 2012. Consistent with federal regulations for public review of SIP revisions³, the notice stated that the public hearing would be cancelled if no member of the public requested by February 20, 2012, that the public hearing be held, and the public would be notified of a cancellation on February 21, 2012.

The January 19, 2012 noticing included:

- E-mail notices to approximately 2,400 recipients who have subscribed to electronic SIP notices, and to CARB and EPA;

² Public Resources Code §21084(a) and Preliminary Review, State CEQ Guidelines §15060(c)(2).

³ 40 CFR 51.102.

- U.S. mail notices to all those who have requested them; and
- A notice posted on the District website. The notice included links to the proposed negative declarations and staff report.

No request for a public hearing was received; therefore, the public hearing was cancelled. The February 21, 2012, noticing for the cancellation included:

- E-mail notices to approximately 2,400 recipients who have subscribed to electronic SIP notices, and to CARB and EPA;
- A notice posted on the bulletin board outside the District office; and
- A notice posted on the District website.

Conclusion

There are no sources within the District to which the CTGs for Automobile and Light-Duty Truck Assembly Coatings, and Fiberglass Boat Manufacturing Materials would apply. The proposed negative declarations will meet the District's RACT requirements under Section 182(b)(2)(A) of the federal Clean Air Act. No public comments or request for hearing were received after the required 30-day notice period. Therefore, Staff recommends that the Board adopt the attached resolutions approving the negative declarations.

Respectfully Submitted

Approved as to form:

Larry Greene
Executive Director/Air Pollution Control

Kathrine Pittard
District Counsel

Attachments