

Ozone State Implementation Plan (SIP) Revision
Reasonably Available Control Technology (RACT) Update as Applicable to the
8-Hour Ozone Standard

Sacramento Metropolitan Air Quality Management District

October 23, 2008

Background

This document constitutes a revision to the Ozone State Implementation Plan (SIP) for the Sacramento Air Quality Management District (SMAQMD). The U.S. Environmental Protection Agency (EPA) published the final Phase 2 Rule to implement the 8-hour ozone air quality standard on November 29, 2005 (70 FR 71611). Among the requirements of the Phase 2 Rule, a new section was added to the Code of Federal Regulations (40 CFR 51.912) that requires the SMAQMD to submit a revision to the SIP that meets the Reasonably Available Control Technology (RACT) requirements for VOC and NO_x in accordance with Sections 182(b)(2) and 182(f) of the federal Clean Air Act for:

- Each category of VOC sources that is covered by a Control Technique Guideline (CTG) document issued by EPA; and
- All major stationary sources of VOC and/or NO_x.

EPA's designations and classifications for the 8-hour ozone standard were published on April 30, 2004 (69 FR 23857) and became effective on June 15, 2004. The Sacramento Metropolitan Area was classified as a serious nonattainment area, with a deadline of 2013 to attain the standard. The major source emissions threshold for areas classified as serious is 50 tons per year of either VOC or NO_x.

On October 26, 2006, the District's Board of Directors adopted a revision to the SIP that fulfilled the aforementioned federal requirements, and this SIP revision was submitted by the California Air Resources Board (CARB) to EPA on July 11, 2007.

Since that time, EPA has promulgated seven new CTGs. In addition, the air districts of the Sacramento Federal Nonattainment Area submitted a letter to CARB in February of 2008 to request a voluntary "bump-up" to a classification of "severe" nonattainment, as provided by Section 181(b)(3) of the federal Clean Air Act. On February 14, 2008, CARB requested that EPA reclassify this area to "severe." It is anticipated the EPA will take action on this request by the end of 2008. A reclassification to severe nonattainment will reduce the major source emissions threshold from 50 to 25 tons per year of either VOC or NO_x, imposing RACT requirements on additional sources within the District.

This SIP revision is based on an analysis performed by SMAQMD staff of the new CTG categories, and of sources which will become major sources upon reclassification to severe nonattainment. The analysis is presented in the *Staff Report for Updated Analysis of Reasonably Available Control Technology for the 8-Hour Ozone State Implementation Plan (Updated RACT SIP)*, SMAQMD, September 22, 2008.

Negative Declarations

The SMAQMD has reviewed its records for permitted sources, the enforcement program for unpermitted sources, telephone yellow pages, and business listings and has determined that there are no stationary sources or emitting facilities for the following CTG categories. In addition, the SMAQMD does not anticipate these sources in the future.

Source Category for Negative Declaration	CTG Document Title	Document Number
Flat Wood Paneling Coatings	Control Techniques Guidelines for Flat Wood Paneling Coatings	EPA 453/R-06-004
Paper, Film, and Foil Coatings	Control Techniques Guidelines for Paper, Film, and Foil Coatings	EPA 453/R-07-003
Large Appliance Coatings	Control Techniques Guidelines for Large Appliance Coatings	EPA 453/R-07-004

RACT Determination for CTG Categories

The SMAQMD has performed an analysis of District rules that are applicable to the 2006/2007 CTG categories for which there are existing sources, as shown in the following table.

Source Category	CTG Document Title	CTG Document Number	SMAQMD Rule No. (Most Recent Amendment)	SIP Status
Offset Lithographic and Letterpress Printing	Control Techniques Guidelines for Offset Lithographic and Letterpress Printing	EPA 453/R-06-002	450 (3/23/00)	Adopted 12/5/96; Approved 11/13/98
Flexible Package Printing	Control Techniques Guidelines for Flexible Package Printing	EPA 453/R-06-003	450 (3/23/00)	Adopted 12/5/96; Approved 11/13/98
Industrial Cleaning Solvents	Control Techniques Guidelines: Industrial Cleaning Solvents	EPA 453/R-06-001	466 (5/23/02)	Not yet submitted
Metal Furniture Coatings	Control Techniques Guidelines for Metal Furniture Coatings	EPA 453/R-07-005	451 (10/2/97)	Adopted 11/29/83; Approved 1/24/85 Adopted 9/5/96; No EPA Action

The District finds that the requirements of RACT for the 2006/2007 CTG categories are satisfied by the District rules, with the following exceptions:

- For flexible package printing, Rule 450 does not meet the CTG requirements for mandatory control equipment on printing presses with potential to emit, prior to controls, of at least 25 tons/year of VOC. The District is committing to correct this RACT deficiency by amending Rule 450 to require control equipment on these presses, consistent with the CTG recommendations. These amendments are scheduled for a public hearing on September 25, 2008. Following adoption, the amended rule will be submitted for inclusion in the SIP.
- For offset lithographic and letterpress printing, Rule 450 does not meet the CTG requirements for mandatory control equipment on printing presses with potential to emit, prior to controls, of at least 25 tons/year of VOC. In addition, the CTG recommends more stringent VOC content limits for fountain solutions used by offset lithographic

printing sources with actual emissions of VOC of at least 15 lb/day (equivalent to 450 lb/month). The District is committing to correct these RACT deficiencies by amending Rule 450 to require mandatory control equipment on presses with potential to emit, prior to controls, of at least 25 tons/year of VOC and to set more stringent VOC limits, consistent with the CTG recommendations, for fountain solutions used by offset lithographic printing sources with actual emissions of VOC of at least 450 lb/month. These amendments are scheduled for a public hearing on September 25, 2008. Following adoption, the amended rule will be submitted for inclusion in the SIP.

- For metal furniture coating operations, the VOC content limits recommended in the CTG for general one-component, extreme high gloss, and extreme performance coatings are more stringent than those required by Rule 451. In addition, Rule 451 allows the use of an emission control system with an overall efficiency of 85%, whereas the CTG recommends 90% overall efficiency. The District is committing to correct these RACT deficiencies by amending Rule 451 to include the CTG-recommended VOC content limits for metal furniture coatings, applicable to sources with actual VOC emissions of at least 3 tons per 12-month rolling period, and to increase the overall efficiency required for emissions control equipment to 90%. These amendments are scheduled for a public hearing on September 25, 2008. Following adoption, the amended rule will be submitted for inclusion in the SIP.

RACT Determination for Sources of VOC or NO_x that will become Major Sources

The SMAQMD has performed an analysis of sources within the District that will become major source of VOC or NO_x upon reclassification to severe nonattainment, and has determined that the requirements of RACT have been satisfied for these sources. The sources that will become major sources are shown in the following table.

New Major Source	Major Pollutant(s)
Cosumnes Power Plant (SMUD)	VOC, NO _x *
Grafil	NO _x
Sacramento Power Authority	NO _x
Silgan Can Company	VOC
UC Davis Medical Center	VOC, NO _x *

* These sources were included in the October 26, 2006 SIP revision as major sources of NO_x. A bump-up to severe nonattainment will make them major sources of VOC, also.