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**REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT)
STATE IMPLEMENTATION PLAN (SIP) REVISION
FOR
WESTERN NEVADA COUNTY
8-HOUR OZONE NONATTAINMENT AREA**

**EVALUATION OF ADEQUACY FOR 2008 OZONE
NATIONAL AMBIENT AIR QUALITY STANDARDS
AND
NEGATIVE DECLARATION FOR CONTROL
TECHNIQUES GUIDELINES ISSUED IN 2016**

Submitted In Partial Fulfillment of Requirements under the Federal Clean Air Act

Date for Public Hearing: November 27, 2017 (alternatively January 22, 2018 in case of November meeting cancellation)

Date for Rule Adoption: Same as Public Hearing (unless comments received necessitate modification)

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EXECUTIVE SUMMARY

This submission addresses Reasonably Available Control Technology (RACT) nonattainment requirements for the 2008 federal ozone standard. The Northern Sierra Air Quality Management District (NSAQMD) has evaluated RACT and Control Techniques Guidelines (CTGs) applicability for all of its stationary sources. In the time that has passed since the NSAQMD's previous RACT rule adoptions and negative declarations, there have been no changes in the nonattainment boundary, and no sources that could potentially exceed the CTGs' de minimis thresholds have become established or increased production in the area.

The NSAQMD has evaluated the 2016 Oil and Natural Gas Industry CTG for applicability, as discussed herein, and has determined that it does not apply to sources located in the nonattainment area. This document is termed a "Negative Declaration," and it provides supporting evidence for the NSAQMD's determination. It also includes a commitment to implement RACT in the event that a source to which a CTG applies is identified in the nonattainment area in the future. A Negative Declaration revises a nonattainment area's State Implementation Plan (SIP), and must be approved by the governing body of the agency with jurisdiction over stationary sources of air pollution in the nonattainment area, following a public notice and a public hearing, pursuant to Section 110(a) of the Clean Air Act.

INTRODUCTION

The Northern Sierra Air Quality Management District includes the rural California counties of Plumas, Sierra and Nevada. Western Nevada County is predominantly rural, with two small cities (Grass Valley, pop. approx. 13,000; and Nevada City, pop. approx. 3,200). The nonattainment area ranges from rolling foothills in the west to mountains rising above 9,000 feet in the east.

Western Nevada County was designated in 2004 by EPA as a Nonattainment Area for the national 1997 8-hour ozone air quality standard, pursuant to the federal Clean Air Act (CAA). In 2012, the area was designated Marginal Nonattainment for the 2008 8-hour ozone standard of 0.075 ppm. Effective June, 2016, Western Nevada County was bumped up to a Moderate Nonattainment area for the 2008 standard, and anticipates having to bump up again to Serious (based on preliminary 2017 monitoring data). This submission addresses requirements for the 2008 ozone standard.

Most of western Nevada County's ozone comes from the Sacramento nonattainment area. There are no major sources in the nonattainment area. The largest stationary source of ozone precursors in western Nevada County (population approximately 78,000) is currently a gas station that emits well under 2 tons of precursors per year.

The CAA requires certain categories of sources (specified in Section 183(e)) in ozone nonattainment areas to implement rules meeting RACT requirements for inclusion in California's SIP. RACT is defined as the lowest emission limitation that a particular source is capable of meeting by the application of control technology (i.e., devices, systems, process modification, or other apparatus or techniques that reduce air pollution) that is reasonably available, considering technological and economic feasibility. The RACT requirement is meant to ensure that ozone nonattainment areas are taking reasonable steps to minimize emissions of ozone precursors, which are oxides of nitrogen (NO_x) and volatile organic compounds (VOCs). In order to assist areas in identifying and implementing RACT, EPA issues CTGs for specific source categories. These are considered to be RACT, and each nonattainment area must implement measures laid out in a CTG, or the equivalent, if there are sources in the area to which that CTG applies. Failure to adopt rules fully satisfying RACT can result in federal sanctions including withholding of federal highway funds and increased emission offset requirements for establishing or expanding major emission sources.

For the 1997 ozone standard, the NSAQMD adopted several RACT rules and otherwise implemented all of the measures EPA identified as RACT via issuance of CTGs through 2008 that apply to existing sources in the nonattainment area, and has submitted Negative Declarations for all CTGs through 2008 that do not apply to sources in the area. No additional CTGs were issued from 2009 through 2015. This submission verifies that the previously submitted negative declarations are still applicable and establishes that there are no sources in the nonattainment area that are subject to the 2016 CTG titled *Control Techniques Guidelines for the Oil and Natural Gas Industry*.

APPLICABILITY ANALYSIS: CTG FOR THE OIL AND NATURAL GAS INDUSTRY

All of the nonattainment area's piped natural gas is supplied by PG&E. There are no natural gas processing plants or well sites in the nonattainment area. Also, there are no oil wells or pipelines in the nonattainment area, and no place where rail tank cars are loaded or unloaded, and no ports.

The CTG states on page 3-5, "This CTG covers select sources of VOC emissions in the onshore production and processing segments of the oil and natural gas industry (i.e., pneumatic controllers, pneumatic pumps, compressors, equipment leaks, fugitive emissions) and storage vessel VOC emissions in all segments (except distribution) of the oil and natural gas industry." There are no oil or natural gas production or processing facilities in western Nevada County. There also are no pre-distribution processes involving storage tanks or vessels in the area. All oil and natural gas industry activity in the nonattainment area is part of the distribution process. This information was verified through e-mail correspondence with PG&E that included PG&E employees Rick Stewart, Ted Robinson (Senior Environmental Field Specialist), Rhonda Shiffman and Gary Ma.

NEGATIVE DECLARATION -- STATEMENT OF ADOPTION

By adoption of this document, the Northern Sierra Air Quality Management District Board of Directors declares that, to the best of its knowledge and following a publicly noticed public hearing, there are no existing or anticipated sources in the Western Nevada County federal ozone Nonattainment Area to which the *Control Techniques Guidelines for the Oil and Natural Gas Industry* or any CTGs for which RACT negative declarations were previously adopted apply.

By adoption of this document, the Northern Sierra Air Quality Management District Board of Directors further declares that RACT will be adopted and implemented, consistent with legal requirements, for all new and existing sources subsequently identified in the Western Nevada County Nonattainment Area to which the subject CTG may apply in the future.

The following table lists all of the CTGs for which the District has previously adopted RACT rules or Negative Declarations, along with relevant notes. For most categories, the de minimis level of emissions is 15 pounds per day of ozone precursors.

Summary Table of NSAQMD's Previous RACT Actions and Negative Declarations (approvals published in the Federal Register at 74 FR 56120, 76 FR 44493, 77 FR 23130, 77 FR 47536, 78 FR 897 and 80 FR 19544)

CTG Titles and References	Determinations and Actions
1. Design Criteria for Stage I Vapor Control Systems - Gasoline Service Stations, November 1975. [EPA never assigned a document number to this CTG.]	These criteria are incorporated into State regulations for Stage 1 vapor recovery. The District revised Rule 214 (approved by EPA at 78 FR 897) to specify associated RACT requirements.
2. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume I: Control Methods for Surface Coating Operations, EPA-450/2-76-028, November 1976. [This document is a compilation of control techniques.]	This does not define RACT for a specific source category, so it was not implemented as RACT. Individual District operating permits specify control techniques for sources in this category.
3. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks, EPA-450/2-77-008, May 1977.	There are no existing or anticipated sources in these categories in the non-attainment area.
4. Control of Volatile Organic Emissions from Solvent Metal Cleaning, EPA-450/2-77-022, November 1977.	The only source type in the non-attainment area that is covered by this CTG is cold cleaners. These are exempt from RACT in the non-attainment area because it is rural (pop. <200,000), pursuant to the EPA memo, "Clarification of Degreasing Regulation Requirements" (September 7, 1978). Thus, RACT was not implemented. Nonetheless, the District went beyond RACT by adopting Rule 229 to address emissions from these types of sources.
5. Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds, EPA-450/2-77-025, October 1977.	There are no existing or anticipated sources in this category in the non-attainment area.
6. Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals, EPA-450/2-77-026, December 1977.	There are no existing or anticipated sources in this category in the non-attainment area.
7. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume III: Surface Coating of Metal Furniture, EPA-450/2-77-032, December 1977.	There are no existing or anticipated sources in this category that exceed de minimis levels in the non-attainment area.
8. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume IV: Surface Coating for Insulation of Magnet Wire, EPA-450/2-77-033, December 1977.	There are no existing or anticipated sources in this category in the non-attainment area.

9. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume V: Surface Coating of Large Appliances, EPA-450/2-77-034, December 1977.	There are no existing or anticipated sources in this category in the non-attainment area.
10. Control of Volatile Organic Emissions from Bulk Gasoline Plants, EPA-450/2-77-035, December 1977.	Per California Air Resources Board analysis, the District's current rules 219 and 220 meet RACT for this source category.
11. Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed Roof Tanks, EPA-450/2-77-036, December 1977.	The District revised Rule 214 (approved by EPA at 78 FR 897) to implement RACT for this source category.
12. Control of Volatile Organic Compounds from Use of Cutback Asphalt, EPA-450/2-77-037, December 1977.	The District adopted Rule 227 (approved by EPA at 74 FR 56120) to implement RACT for this source category.
13. Control Techniques for Volatile Organic Emissions from Stationary Sources, EPA-450/2-78-022, May 1978.	This does not define RACT for a specific source category, so it was not implemented as RACT. Individual District operating permits specify control techniques for sources in this category.
14. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VI: Surface Coating of Miscellaneous Metal Parts and Products, EPA-450/2-78-015, June 1978.	The District adopted Rule 228 (approved by EPA at 77 FR 47536) to implement RACT for this source category.
15. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VII: Factory Surface Coating of Flat Wood Paneling, EPA-450/2-78-032, June 1978.	There are no existing or anticipated sources in this category in the non-attainment area.
16. Control of Volatile Organic Compound Leaks from Petroleum Refinery Equipment, EPA-450/2-78-036, June 1978.	There are no existing or anticipated sources in this category in the non-attainment area.
17. Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products, 450/2-78-029, December 1978.	There are no existing or anticipated sources in this category in the non-attainment area.
18. Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires, EPA-450/2-78-030, December 1978.	There are no existing or anticipated sources in this category in the non-attainment area.
19. Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VIII: Graphic Arts - Rotogravure and Flexography, EPA-450/2-78-033, December 1978.	There are no existing or anticipated sources in these categories that exceed de minimis levels in the non-attainment area.
20. Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks, EPA-450/2-78-047, December 1978.	There are no existing or anticipated sources in this category in the non-attainment area.
21. Control of Volatile Organic Emissions from Perchloroethylene Dry Cleaning Systems, EPA-450/2-78-050, December 1978.	No longer a required RACT analysis category, since PERC has been exempted as a VOC.

22. Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems, EPA-450/2-78-051, December 1978.	The District revised Rule 214 (approved by EPA at 78 FR 897) to implement RACT for this source category. Existing Rule 218 also applies to tank trucks. Approved by EPA at 77 FR 47536.
23. Fugitive Emission Sources of Organic Compounds – Additional Information on Emissions, Emission Reductions, and Costs, EPA-450/3-82-010, April 1982.	This does not define RACT for a specific source category, so it was not implemented as RACT.
24. Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009, September 1982.	There are no existing or anticipated sources in this category that exceed de minimis levels in the non-attainment area.
25. Control of Volatile Organic Compound Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins, EPA-450/3-83-008, November 1983.	There are no existing or anticipated sources in these categories in the non-attainment area.
26. Control of Volatile Organic Compound Equipment Leaks from Natural Gas/Gasoline Processing Plants, EPA-450/2-83-007, December 1983.	There are no existing or anticipated sources in these categories in the non-attainment area.
27. Control of Volatile Organic Compound Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment, EPA-450/3-83-006, March 1984.	There are no existing or anticipated sources in these categories in the non-attainment area.
28. Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry, EPA-450/3-84-015, December 1984.	There are no existing or anticipated sources in this category in the non-attainment area.
29. Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry, EPA 450/4-91-031, August 1993.	There are no existing or anticipated sources in this category in the non-attainment area.
30. Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations, EPA-453/R-96-007, April 1996.	There are no existing or anticipated sources in this category that exceed de minimis levels in the non-attainment area.
31. Control Techniques Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating), EPA 453/R-94-032, August 1996.	There are no existing or anticipated sources in this category in the non-attainment area.
32. Aerospace (CTG & MACT), EPA-453/R-97-004, December 1997.	There are no existing or anticipated sources in this category in the non-attainment area.
33. Control Techniques Guidelines for Industrial Cleaning Solvents, EPA-453/R-06-001, September 2006.	There are no existing or anticipated sources in this category that exceed de minimis levels in the non-attainment area.
34. Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing, EPA-453/R-06-002, September 2006.	There are no existing or anticipated sources in this category that exceed de minimis levels in the non-attainment area.

35. Control Techniques Guidelines for Flexible Package Printing, EPA-453/R-06-003, September 2006.	There are no existing or anticipated sources in this category that exceed de minimis levels in the non-attainment area.
36. Control Techniques Guidelines for Flat Wood Paneling Coatings, EPA-453/R-06-004, September 2006.	There are no existing or anticipated sources in this category in the non-attainment area.
37. Control Techniques Guidelines for Paper, Film, and Foil Coatings, EPA 453/R-07-003, September 2007.	There are no existing or anticipated sources in this category in the non-attainment area.
38. Control Techniques Guidelines for Large Appliance Coatings, EPA 453/R-07-004, September 2007.	There are no existing or anticipated sources in this category in the non-attainment area.
39. Control Techniques Guidelines for Metal Furniture Coatings, EPA 453/R-07-005, September 2007.	There are no existing or anticipated sources in this category that exceed de minimis levels in the non-attainment area.
40. Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings, EPA 453/R-08-003, September 2008.	The District adopted Rule 228 (approved by EPA at 77 FR 47536) to implement RACT for this source category.
41. Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials, EPA 453/R-08-004, September 2008.	There are no existing or anticipated sources in this category that exceed de minimis levels in the non-attainment area.
42. Control Techniques Guidelines for Miscellaneous Industrial Adhesives, EPA 453/R-08-005, September 2008.	There are no existing or anticipated sources in this category that exceed de minimis levels in the non-attainment area.
43. Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings, EPA 453/R-08-006 (and 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), September 2008.	There are no existing or anticipated sources in this category that exceed de minimis levels in the non-attainment area.

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