

Northern Sierra

Air Quality

Management District

REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT) STATE
IMPLEMENTATION PLAN (SIP)
FOR THE 2015 8-HOUR OZONE
NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS)

WESTERN NEVADA COUNTY

PROPOSAL

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Introduction

A. Purpose

The Northern Sierra Air Quality Management District (NSAQMD or District) is required to update the Reasonably Available Control Technology State Implementation Plan (“RACT SIP”) analysis. This requirement results from the Western Nevada County (WNC) Nonattainment Area’s classification as “serious” non-attainment of the federal 8-hour Ozone National Ambient Air Quality Standard (NAAQS) of 70 parts per billion (ppb).

B. 2015 Ozone NAAQS

On October 1, 2015, the U.S. Environmental Protection Agency (EPA) revised the federal 8-hour Ozone NAAQS again by lowering it from 75 ppb to 70 ppb¹ (2015 NAAQS). The California Air Resources Board (CARB) performed analyses to determine appropriate designation recommendations throughout the State using the criteria outlined in EPA’s guidance memorandum². One of the first steps of determining attainment is to compare the Ozone Design Value (DV) to the level of the standard. The DV reflects a three-year average of the fourth highest 8-hour average concentration at each monitoring site. If the DV is 71 ppb or greater, it violates the 2015 NAAQS. These three-year average DVs are updated once the monitoring data from each calendar year are reviewed and certified.

Depending on the magnitude of the area’s Ozone DV and EPA’s guidance, Nonattainment Areas are classified as Marginal, Moderate, Serious, Severe, or Extreme. On June 4, 2018, the EPA classified the Western Nevada County portion of the district Nonattainment Area as “Moderate” pursuant to the 2015 NAAQS. In May 2021, CARB submitted to the EPA a request from NSAQMD to voluntarily reclassify Western Nevada from Moderate to “Serious” nonattainment for the 2015 Ozone NAAQS. On October 28, 2021, the area was reclassified as a Serious Nonattainment Area (effective November 29, 2021)³.

C. Federal RACT SIP Requirement

EPA’s Phase 2 Ozone Rule⁴ requires that areas that are classified as moderate non-attainment or higher must demonstrate in a State Implementation Plan (SIP) that their rules fulfill Reasonably Available Control Technology (RACT) requirements for volatile organic compounds (VOC) and nitrogen oxides (NO_x), which are Ozone precursors, in accordance with Federal Clean Air Act Amendments of 1990 (CAAA), Sections 182(b)(2) and 182(f).

RACT is defined 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”⁵. The implementation of RACT requires:

- Rules covering source categories with RACT guidance documents, including Control Techniques Guideline (CTG) issued by the EPA, for which there are sources in the

¹ 80 Federal Register 65292; October 26, 2015

² February 25, 2016, Area Designations for the 2015 Ozone National Ambient Air Quality Standards, Memorandum from Janet G. McCabe, Acting Assistant Administrator, Office of Air and Radiation to Regional Administrators, Regions 1-10.

³ 86 FR 59648-59651; October 28, 2021.

⁴ 40 CFR 51.912 and 70 FR 71612

⁵ 44 FR 53762

- District that have emission levels that trigger the RACT guidance document threshold.
- Rules covering all major sources of NO_x or VOC that are in the District.
 - CTG guidance must be adopted in District rules, and RACT SIP revisions, generally within one year of the CTG issuance date.

NSAQMD has examined its RACT SIP rules and researched other Ozone Nonattainment Area rules for the types of sources covered by RACT and the CTGs, as discussed below. NSAQMD has been unable to identify more stringent measures for these source types that are reasonably available considering technological and economic feasibility. The Nonattainment Area is primarily rural, with little industrial activity, and has among the lowest emissions of any federal Ozone Nonattainment Area. Many of the CTG categories have a threshold of 15 lbs./day. Four rules from NSAQMD were reevaluated under the CTGs as meeting RACT requirements. The main four other air districts whose rules were evaluated for comparative stringency were Ventura County APCD, Eastern Kern APCD, Placer County APCD, and Sac Metro AQMD.

RACT Analysis

A. Background

The RACT SIP must contain, at the very least, CTG-equivalent regulations for affected sources operating within the District's Nonattainment Area. Demonstration of existing regulations applicable to non-CTG major sources is appropriate for satisfying RACT when the cumulative potential to emit from a single source (facility) exceeds the Nonattainment Area's major source emission threshold. This RACT SIP is designed to demonstrate compliance with RACT requirements for non-CTG major sources with a potential to emit 50-tons per year (tpy) or greater of VOCs or NO_x because the District is designated Serious nonattainment for the 2015 Ozone NAAQS. Major sources are defined as sources that are above the major source threshold within a Nonattainment Area.

Negative declaration of a CTG category is required when there is no applicable source operating in the District's Ozone Nonattainment Area to which a CTG would apply, including sources located within the District's Nonattainment Area with emissions below the applicability threshold of the specified CTG source category. Additionally, negative declarations are required if the District does not have non-CTG major sources of NO_x and VOC. The District will provide notice and opportunity for public to comment on the draft RACT SIP, even where District certifies the existing regulation(s) satisfy RACT requirements, or where the District adopts a negative declaration. The District will also submit appropriate supporting information for their RACT demonstrations.

B. RACT Evaluations

Rule 214 (Phase 1 Vapor Recovery Requirements) was amended on 4/25/2011 and approved into the SIP on 1/7/2013 (78 FR 897) as meeting RACT for the "Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems" CTG (EPA-450/2-78-051, December 1978) and also the "Design Criteria for Stage I Vapor Control Systems – Gasoline Service Stations" CTG (EPA-450/R-75-102, November 1975). Based on a comparative rule review the District is not aware of other reasonably available technology capable of reducing emissions from this source category. Based on the NSAQMD's research, the requirements are

comparable to most other Nonattainment Areas, differing in detail rather than key limits and exemptions. The key provisions in common include requirements that stationary gasoline tanks with a capacity greater than 250 gallons must be equipped with a CARB-certified Phase 1 vapor recovery system, be equipped with a permanent submerged fill pipe, and have a vapor control efficiency of 98% or better for underground storage tanks and 95% or better for aboveground storage tanks. During the analysis, the NSAQMD observed that Placer County, as part of the Sacramento Severe Nonattainment Area, has a similar rule (Rule 213, amended 2/21/13) but it does not include the pump-out of storage tanks into mobile fuelers – only transfer into storage tanks. Also, Ventura County APCD’s similar Phase 1 rule (Rule 70, amended April 2009) also does not apply to gasoline transfer into mobile fuelers, whereas NSAQMD’s rule does. Eastern Kern did amend their District Rule 412 on 1/13/2022 with the update of including storage containers located at bulk plants with capacities greater than 250 gallons and to gasoline delivery vessels. However, NSAQMD does not have any gas stations that qualify as major sources of Ozone precursors. Nonetheless, since this rule is important for minimizing Ozone precursor emissions from a large source category in the Nonattainment Area, the NSAQMD is including Rule 214 in this RACT SIP submittal.

In 2021, EPA issued a Technical Support Document discussing its evaluation and conclusions of the 2015 Ozone NAAQS RACT SIP for the “moderate” classification. It includes the following summary information from that review.

“The CTGs that apply to this source category are entitled “Design Criteria for Stage I Vapor Control Systems – Gasoline Service Stations” (EPA-450/R-75-102) and “Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems” (EPA-450/2-78-051). In our January 15, 2020 (85 FR 2313) final rulemaking approving the 2008 RACT SIP, we found that Rule 214, “Phase I Vapor Recovery Requirements” (2013)⁶, met the applicable CTGs. We concluded in our 2020 final rulemaking that the Northern Sierra Rule 214 was generally consistent with analogous rules in these other air districts and that it continued to implement current RACT⁷. Since our action, none of the comparable rules has been revised, and we are not aware of changes in RACT for these CTGs. Therefore, we conclude that Northern Sierra Rule 214 is generally consistent with analogous rules in these other air districts and continues to implement current RACT.”

NSAQMD Gas Station permitting staff believe that all aspects of this previous evaluation by EPA remain correct. Based on a careful review, the NSAQMD has determined that Rule 214 meets RACT for the 2015 Ozone NAAQS.

Rule 215 (Phase 2 Vapor Recovery System Requirements) was last amended February 10, 2010 and approved into the SIP for the 1997 standard⁸. This 14-page rule contains many specific requirements and is difficult to compare with similar rules from other areas, which often combine requirements for Phase 1, Phase 2 and bulk gasoline facilities into a single rule. Using Ventura County APCD again for comparison, Ventura’s similar rule (Rule 70, amended April 2009, which covers both Phase 1 and Phase 2 gasoline vapor recovery) was last amended earlier than

⁶ Northern Sierra Air Quality Management District Resolution #2021-03, January 25, 2021.

⁷ In the 2020 approval of the 2008 ozone RACT SIP, NSAQMD stated that “we reviewed Rule 214 and compared its requirements to analogous rules, e.g., Sacramento Metropolitan AQMD Rule 448, “Gasoline Transfer into Stationary Storage Containers” (amended 2/26/09), Placer County APCD Rule 213, “Gasoline Transfer into Stationary Storage Containers” (amended 2/21/13), and South Coast AQMD Rule 461, “Gasoline Transfer and Dispensing” (amended 4/6/12)

⁸ 76 FR 44493, July 26, 2011.

NSAQMD's. They both require 95% control efficiency and defect-free, CARB-certified components. Ventura's rule exempts privately owned storage containers fueling a fleet with 95% ORVR-equipped vehicles, whereas NSAQMD's rule only exempts non-retail facilities fueling a fleet with 100% ORVR-equipped vehicles, making NSAQMD's rule more stringent in this respect.

In 2021, EPA issued a Technical Support Document discussing its evaluation and conclusions of the 2015 Ozone NAAQS RACT SIP for the "moderate" classification. It includes the following summary information from that review.

"The EPA has not issued a CTG for refueling of motor vehicles, and, based on a review of CARB's emissions inventory for 2019, there are no gasoline stations that are major stationary sources in the Western Nevada NAA. Therefore, we agree with the NSAQMD that this rule is not required for the 2015 ozone RACT SIP. Nonetheless, on July 26, 2011, at the request of the District, the EPA approved Rule 215 (2010) into the SIP, finding that it satisfied RACT requirements."

While EPA has approved this rule as meeting RACT-level controls for previous Ozone NAAQS, it is not required for the NSAQMD's RACT SIP for the 2015 Ozone NAAQS under existing legislation because the NSAQMD does not have any gas stations that qualify as major sources of Ozone precursors. Nonetheless, since this rule is important for minimizing Ozone precursor emissions from a large source category in the Nonattainment Area, the NSAQMD is including Rule 215 in this RACT SIP submittal.

Rule 227 (Cutback and Emulsified Asphalt Paving Materials) was proposed for approval into the SIP on July 13, 2009⁹ and approved into the SIP for the 1997 8-hour Ozone NAAQS on October 30, 2009¹⁰ as meeting RACT for the Control of Volatile Organic Compounds from Use of Cutback Asphalt CTG (EPA-450/2-77-037, December 1977). EPA subsequently determined that the rule continued to meet RACT for the 2008 Ozone NAAQS¹¹. The NSAQMD compared its rule with Ventura's Serious classification Cutback Asphalt rule (74.4, amended July 1983) and found that Ventura's is less stringent; Ventura's has an exemption for penetrating prime coat applications and does not include recordkeeping requirements. Rule 227 is essentially identical to Placer County's Rule 217, including the title. However, the NSAQMD rule contains an exemption for the use of medium cure asphalt on days not forecast to reach ambient temperature exceeding 10 degrees. This exemption is present in Placer County's Rule 217. The NSAQMD rule, like the Placer County rule, contains detailed recordkeeping requirements. Eastern Kern has an asphalt Rule 410.5 (amended on March 7, 1996); however, Eastern Kern location does not have a similar topography compared to Placer and Northern Sierra with a different temperature guideline based on lower elevation compared to the high elevation districts.

The rule differs from the control technology set forth in EPA's guidance document, "Beyond VOC RACT CTG Requirements" (April 1995) in that the guidance merely recommends substituting emulsified asphalt for cutback asphalt while the rule still allows the use of cutback asphalt but limits the VOC content and limits the VOC content of emulsified asphalt. The NSAQMD concludes that the rule is similar in effect to the guidance and is equally stringent.

In 2021, EPA issued a Technical Support Document discussing its evaluation and conclusions of

⁹ 74 FR 33397

¹⁰ 74 FR 56120

¹¹ 85 FR 2313, January 15, 2020.

the 2015 Ozone NAAQS RACT SIP for the “moderate” classification. It includes the following summary information from that review.

“The CTG that applies to this source category is “Control of Volatile Organic Emissions from Use of Cutback Asphalt” (EPA-450/2-77- 37). In our January 15, 2020, final rulemaking approving the 2008 RACT SIP¹², we found that Rule 227, “Cutback and Emulsified Asphalt Paving Materials,” met the applicable CTG. We concluded that the Northern Sierra Rule 227 was generally consistent with analogous rules in these other air districts and that it continued to implement current RACT¹³. The final rulemaking and TSD contain the details of our 2008 ozone RACT evaluation, including a discussion of warm mix asphalt¹⁴. Since our action, none of these other comparable rules has been revised, and we are not aware of changes in RACT for these CTG. Therefore, we conclude that Northern Sierra Rule 227 is generally consistent with analogous rules in these other air districts and continues to implement current RACT.”

The District is not aware of other reasonably available technological or operational controls likely to significantly reduce emissions from this source category for the 2015 Ozone standard. Therefore, the NSAQMD concludes that the Rule 227 meets RACT for the 2015 Ozone NAAQS and propose to adopt a negative declaration for the cutback asphalt since only one facility is in the Ozone Nonattainment Area and produce less than 50 tpy¹⁵, the major source threshold for the District’s current Ozone nonattainment classification.

Rule 228 (Surface Coating of Metal Parts and Products) was originally adopted November 27, 2006, and submitted to EPA in June 2007 for inclusion in the SIP. Rule 228 was based on EPA’s CTG for “Surface Coating of Miscellaneous Metal Parts and Products” (EPA-450/2-78- 015). However, in 2008 EPA issued a CTG titled “Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings” (EPA-453/R-08-003), which covers the same types of sources as the 1978 CTG plus additional types of sources, contains more stringent requirements than the 1978 CTG, which applies to a wider range of coatings, and also addresses solvent usage. Consequently, Rule 228 was amended April 25, 2011, accordingly and approved into the RACT SIP by EPA¹⁶ for the 1997 Ozone NAAQS. EPA subsequently determined that the rule continued to meet RACT for the 2008 Ozone NAAQS¹⁷.

The District currently has one facility, Jada Windows Inc., which paints stainless steel metal frames for custom windows using a spray booth. This facility opened in 2021 in the Nonattainment Area and was required to have an Authority to Construct/Permit to Operate because the District rule requires permits for stationary sources emitting ½ ton or more of any criteria air pollutant. In 2022, Jada Windows Inc. emitted 0.25 tons of NOx (1.37 lbs./day) and

¹² 85 FR 2313 (January 15, 2020)

¹³ For the 2008 RACT SIP, we compared Rule 227 to the following analogous rules: Sacramento Metropolitan Rule AQMD Rule 453, “Cutback and Emulsified Asphalt Paving Materials,” (8/31/82), Placer County APCD Rule 217, “Cutback And Emulsified Asphalt Paving Materials” (10/19/93), and South Coast AQMD Rule 1108, “Cutback Asphalt” (2/1/85), and Rule 1108.1, “Emulsified Asphalt” (11/4/83).

¹⁴ Id. and EPA Region IX’s “Technical Support Document for EPA’s Rulemaking for the California State Implementation Plan Northern Sierra Air Quality Management District Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision for Western Nevada County 8-Hour Ozone Nonattainment Area,” September 2019 (“2008 ozone TSD”).

¹⁵ The memorandum dated October 11, 1978 from G.T. Helms, Office of Air Quality Planning and Standards, U.S. EPA to EPA Regions I-X, Subject: “Questions and Answers on 1979 SIP Revisions,” states that the CTG limitations for cutback asphalt can be avoided in rural areas if it can be demonstrated that the total emissions from the use of cutback asphalt in the entire area does not exceed 100 tpy. This exemption threshold shall be lowered based on the major source threshold for the District’s current ozone nonattainment classification.

https://www3.epa.gov/ttn/naaqs/aqmguides/collection/Doc_0032_VOC481011781.pdf.

¹⁶ 77 FR 47536, August 9, 2012

¹⁷ 85 FR 2313, January 15, 2020

0.35 tons of VOC (1.92 lbs./day), utilizes low-VOC coating materials alternatives, and uses equipment with a capture efficiency of at least 85% and a control device efficiency of 90% or higher.

Rule 228 reduces VOC emissions by specifying VOC content limits in coatings used to coat metal parts and work practices for miscellaneous metal parts coatings. The rule was compared to Placer County APCD Rule 245 (amended 8/20/2009, Sac Metro AQMD Rule 451 (amended 10/28/2010), and Ventura County APCD Rule 74.12 (amended 4/8/2008). While minor differences in work practice requirements, solvent cleaning, exemptions, control efficiency of at least 90%, and similar VOC content limits, the differences do not impact the RACT determination.

NSAQMD determined Rule 228 is comparable to rules of other districts in the region and satisfies RACT for the “Surface Coating of Miscellaneous Metal Parts and Products” CTG (EPA-450/2-78- 015). Additionally, the NSAQMD proposes to adopt a negative declaration for the “Miscellaneous Metal and Plastic Parts Coatings” CTG (EPA 453/R-08-003) as emissions from the facility are below the CTG applicability threshold of 6.8 kg/day (15 lb./day) actual VOC emissions.

RACT SIP Evaluation Findings

NSAQMD staff have researched the Stationary Sources in the Western Nevada County region. Western Nevada County has no Title V facilities and thirteen stationary source facilities. Current NSAQMD rules applicable to CTG source categories were determined to meet or exceed CTG requirements. Under EPA’s 2015 8-hour Ozone regulations for Serious Ozone Nonattainment Areas, the major source threshold is 50 tons per year of either NO_x or VOC for any major stationary sources. There are no existing or anticipated major sources of VOC or NO_x in the Western Nevada County Nonattainment Area.

Table 1. All CTGs, Indicating NSAQMD's Current Rules, RACT Actions and Negative Declarations.

Source Category	CTG Titles and References	District Rule	Determinations and Action
Gasoline Service Stations	Design Criteria for Stage I Vapor Control Systems – Gasoline Service Stations (EPA-450/R-75-102, 1975/11)	Rule 214	These criteria are incorporated into State regulations for Stage 1 vapor recovery. The District revised Rule 214 (approved by EPA into the RACT SIP at 78 FR 897, 1/7/13) to specify associated RACT requirements.
Solvent Metal Cleaning	Control of Volatile Organic Emissions from Solvent Metal Cleaning (EPA-450/2-77-022, 1977/11)		The only source type in the Nonattainment Area that is covered by this CTG is cold cleaners. These are exempt from RACT in the Nonattainment Area because it is rural (pop. <200,000), pursuant to the EPA memo, “Clarification of Degreasing Regulation Requirements” (September 7, 1978). A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks	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, 1977/05)		There are no existing or anticipated sources in these categories in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. The District continues to have no sources subject to this CTG. <i>Negative Declaration</i>
Petroleum Refineries	Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds (EPA-450/2-77-025, 1977/10)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Tank Trucks Gasoline Loading Terminals	Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals (EPA-450/2-77-026, 1977/10)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Surface Coating of Metal Furniture	Control of VOC Emissions from Existing Stationary Sources – Volume III: Surface Coating of Metal Furniture (EPA-450/2-77-032, 1977/12)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Surface Coating for Insulation of 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, 1977/12)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354.

			<i>Negative Declaration</i>
Surface Coating of Large Appliances	Control of VOC Emissions from Existing Stationary Sources – Volume V: Surface Coating of Large Appliances (EPA-450/2-77-034, 1977/12)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Bulk Gasoline Plants	Control of VOC Emissions from Bulk Gasoline Plants (EPA-450/2- 77-035, 1977/12)		There are no existing or anticipated sources in this category that exceed levels (4,000 gallons per day throughput on a 30-day rolling average) in the Nonattainment Area. A negative declaration was approved by EPA for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Storage of Petroleum Liquids in Fixed-Roof Tanks	Control of VOC Emissions from Storage of Petroleum Liquids in Fixed-Roof Tanks (EPA-450/2-77-036, 1977/12)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Cutback Asphalt from Paving Operation	Control of VOC Emissions from Use of Cutback Asphalt (EPA-450/2-77- 037, 1977/12)	Rule 227	The District adopted Rule 227 (approved by EPA into the RACT SIP at 74 FR 56120, 10/30/09) to implement RACT for this source category. An EPA memo in 1979 states that the CTG limitations for cutback asphalt can be avoided in rural areas if it can be demonstrated that the total emissions from the use of cutback asphalt in the entire area does not exceed the major source threshold for the District’s current ozone nonattainment classification, 50 tpy. <i>Negative Declaration</i>
Surface Coating of Miscellaneous Metal Parts and Products	Control of VOC Emissions from Existing Stationary Sources – Volume VI: Surface Coating of Miscellaneous Metal Parts and Products (EPA-450/2-78-015, 1978/06)	Rule 228	The District amended Rule 228 (approved into the RACT SIP by EPA at 77 FR 47536, 8/9/12) to implement RACT for this source category. The District has compared Rule 228 with other districts and meets the RACT requirement. Also, EPA stated that this rule is more stringent than the MMPP CTG’s recommendation limits. ¹⁸
Surface Coating of Flat Wood Paneling	Control of VOC Emissions from Existing Stationary Sources – Volume VII: Factory Surface Coating of Flat Wood Paneling (EPA-450/2-78-032, 1978/06)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. The District continues to have no sources subject to this CTG.

¹⁸ EPA Region IX, “Technical Support Document for EPA’s Rulemaking for the California State Implementation Plan Northern Sierra Air Quality Management District Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) Revision for Western Nevada County 8-Hour Ozone Nonattainment Area,” September 2019.

			<i>Negative Declaration</i>
Leaks from Petroleum Refinery Equipment	Control of VOC Leaks from Petroleum Refinery Equipment (EPA-450/2-78-036, 1978/06)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Synthesized Pharmaceutical Products	Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products (EPA-450/2-78-029, 1978/12)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Manufacture of Pneumatic Rubber Tire	Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires (EPA-450/2-78-030, 1978/12)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Graphic Arts	Control of VOC Emissions from Existing Stationary Sources – Volume VIII: Graphic Arts- Rotogravure and Flexography (EPA- 450/2-78-033, 1978/12)		There are no existing or anticipated sources in these categories that exceed 100 tpy de minimis levels in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. The District continues to have no sources subject to this CTG. <i>Negative Declaration</i>
Storage of Petroleum Liquids in External Floating Roof Tanks	Control of VOC Emissions from Petroleum Liquid Storage in External Floating Roof Tanks (EPA-450/2-78-047, 1978/12)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Gasoline Tank Trucks and Vapor Collection Systems	Control of VOC Leaks from Gasoline Tank Trucks and Vapor Collection Systems (EPA-450/2-78-051, 1978/12)	Rule 214	The District revised Rule 214 (approved into the RACT SIP by EPA at 78 FR 897, 3/8/13) to implement RACT for this source category.
Large Petroleum Dry Cleaners	Control of VOC Emissions from Large Petroleum Dry Cleaners (EPA-450/3-82-009, 1982/09)		There are no existing or anticipated sources in this category that exceed levels (32,500 gallons/year) in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354.

			<i>Negative Declaration</i>
Polymers and Resins Manufacturing Industry	Control of VOC Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins (EPA-450/3-83-008, 1983/11)		There are no existing or anticipated sources in these categories in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Equipment Leaks from Natural Gas/Gasoline Processing Plants	Control of VOC Equipment Leaks from Natural Gas/Gasoline Processing Plants (EPA-450/3-83-007, 1983/12)		There are no existing or anticipated sources in these categories in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Equipment Leaks from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment	Control of VOC Leaks from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment (EPA-450/3-83-006, 1984/03)		There are no existing or anticipated sources in these categories in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Synthetic Organic Chemical Manufacturing Industry	Control of VOC Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry (EPA-450/3-84-015, 1984/12)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Synthetic Organic Chemical Manufacturing Industry	Control of VOC Emissions from Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry (EPA-450/4-91-031, 1993/08)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Wood Furniture Manufacturing Operations	Control of VOC Emissions from Wood Furniture Manufacturing Operations (EPA-453/R-96-007, 1996/04)		There are no existing or anticipated sources in this category that exceed levels (potential to emit 25 tons per year of VOCs) in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Shipbuilding and Ship Repair Operations	Control Techniques Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating) (61 FR 44050 8/27/1996, 1996/08); Alternative Control Techniques Document – Surface Coating Operations at Shipbuilding		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354.

	and Ship Repair Facilities (EPA-453/R-94-032, 1994/04)		<i>Negative Declaration</i>
Surface Coating Operations of Aerospace Manufacturing and Rework Operations	Control of VOC Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations (EPA-453/R-97-004, 1997/12), See also Aerospace MACT (59 FR-29216 6/6/94, 1994/06)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/13/15 at 80 FR 19544, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Industrial Cleaning Solvents	Control Techniques Guidelines for Industrial Cleaning Solvents (EPA-453/R-06-001, 2006/09)		There are no existing or anticipated sources in this category that exceed 15 lbs./day actual emissions de minimis levels in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Offset Lithographic and Letterpress Printing	Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing (EPA-453/R-06-002, 2006/09)		There are no existing or anticipated sources in this category that exceed levels (actual emissions of 15 lbs./day or 3 tons per 12-month period) in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Flexible Package Printing	Control Techniques Guidelines for Flexible Package Printing (EPA-453/R-06-003, 2006/09)		There are no existing or anticipated sources in this category that exceed levels (actual emissions of 15 lbs./day or 3 tons per 12-month period) in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Flat Wood Paneling Coatings	Control Techniques Guidelines for Flat Wood Paneling Coatings (EPA- 453/R-06-004, 2006/09)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Paper, Film, and Foil Coatings	Control Techniques Guidelines for Paper, Film, and Foil Coatings (EPA-453/R-07-003, 2007/09)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354.

			<i>Negative Declaration</i>
Large Appliance Coatings	Control Techniques Guidelines for Large Appliance Coatings (EPA-453/R-07-004, 2007/09)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Metal Furniture Coatings	Control Techniques Guidelines for Metal Furniture Coatings (EPA- 453/R-07-005, 2007/09)		There are no existing or anticipated sources in this category in the Nonattainment Area. A negative declaration was approved by EPA for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Miscellaneous Metal and Plastic Parts Coatings	Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings (EPA-453/R-08-003, 2008/09)	Rule 228	The District amended Rule 228 (approved by EPA at 77 FR 47536, 10/9/2012) to implement RACT for this source category. There is only one source that is well below the threshold from the Nonattainment Area facilities is recommended 6.8 kg/day (15 lbs./day) actual VOC emissions. <i>Negative Declaration</i>
Fiberglass Boat Manufacturing	Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials (EPA-453/R-08-004, 2008/09)		There are no existing or anticipated sources in this category that exceed levels (actual emissions of 15 lbs./day or 3 tons per 12-month period) in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Miscellaneous Industrial Adhesives	Control Techniques Guidelines for Miscellaneous Industrial Adhesives (EPA-453/R-08-005, 2008/09)		There are no existing or anticipated sources in this category that exceed levels (actual emissions of 15 lbs./day or 3 tons per 12-month period) in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Automobile and Light-Duty Truck Assembly Coatings	Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings (EPA-453/R-08-006, 2008/09); 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, 2008/09)		There are no existing or anticipated sources in this category that exceed levels (actual emissions of 15 lbs./day) in the Nonattainment Area. A negative declaration was approved by EPA for the 1997 NAAQS 4/18/12 at 77 FR 23130, for the 2008 NAAQS 1/15/20 at 85 FR 2313, and for the 2015 NAAQS moderate area 9/2/2022 at 87 FR 47354. <i>Negative Declaration</i>
Oil and Natural Gas Industry	Control Techniques Guidelines for the Oil and Natural Gas Industry (EPA-453/B-16-001, 2016/10)		There are no existing or anticipated sources in this category in the Nonattainment Area.

			<i>Negative Declaration</i>
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Table 2. Existing District Rules That Have Been Determined to Meet RACT.

NSAQMD Rule	Rule Name	NSAQMD Sources	Date Adopted	Analysis Used to Determine that the Rule meets RACT
214	Phase I Vapor Recovery Requirements	Minor	4/25/2011	The California standard for gasoline vapor recovery is more stringent than the Federal requirement. Districts that were compared: Ventura County APCD, Eastern Kern APCD, and Placer County APCD.
215	Phase II Vapor Recovery System Requirements	Minor	2/22/2010	The California standard for gasoline vapor recovery is more stringent than the Federal requirement. District that were compared: Ventura County APCD and Placer County APCD.
227	Cutback and Emulsified Asphalt Paving Materials	Minor	11/27/2006	Rule 227 meets RACT. Districts that were compared: Ventura County APCD, Eastern Kern APCD, and Placer County APCD.
228	Surface Coating of Metal Parts and Products	Minor	4/25/2011	Rule 228 meets RACT. Districts that were compared: Ventura County APCD, Sac Metro AQMD, and Placer County APCD.

Table 3. Major Sources of non-CTG VOC/NOx Sources for 2015 WNC Ozone NAAQS.

Category	Determinations and Action
Major non-CTG sources of VOC	There are no existing or anticipated sources in this category in the Nonattainment Area. <i>Negative Declaration</i>
Major non-CTG sources of NOx	There are no existing or anticipated sources in this category in the Nonattainment Area. <i>Negative Declaration</i>

RACT SIP CTG and Major Source Checklist

Air District: Northern Sierra Air Quality Management District	Reviewer:	Ozone NAAQS: 2015 Classification: Serious Major source threshold (tpy): 50 tpy
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CTG #	CTG #	CTG Title	Existing SIP Rule # claimed as “current” RACT (SIP-approved date) ¹⁹	Neg Dec submitted ²⁰	New or rev. Rule submitted (year adopted)	Not addressed
1	EPA-450/R-75-102	Design Criteria for Stage I Vapor Control – Gasoline Service Stations	Rule 214 (1/7/2013, 78 FR 897)			
2	EPA-450/2-77-008	Surface Coating of Cans		Yes		
3	EPA-450/2-77-008	Surface Coating of Coils		Yes		
4	EPA-450/2-77-008	Surface Coating of Paper		Yes		
5	EPA-450/2-77-008	Surface Coating of Fabric		Yes		
6	EPA-450/2-77-008	Surface Coating of Automobiles and Light-Duty Trucks		Yes		
7	EPA-450/2-77-022	Solvent Metal Cleaning		Yes		
8	EPA-450/2-77-025	Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds		Yes		
9	EPA-450/2-77-026	Tank Truck Gasoline Loading Terminals		Yes		
10	EPA-450/2-77-032	Surface Coating of Metal Furniture		Yes		
11	EPA-450/2-77-033	Surface Coating for Insulation of Magnet Wire		Yes		
12	EPA-450/2-77-034	Surface Coating of Large Appliances		Yes		
13	EPA-450/2-77-035	Bulk Gasoline Plants		Yes		
14	EPA-450/2-77-036	Storage of Petroleum Liquids in Fixed-Roof Tanks		Yes		
15	EPA-450/2-77-037	Cutback Asphalt		Yes		
16	EPA-450/2-78-015	Surface Coating of Miscellaneous Metal Parts and Products	Rule 228 (8/9/2012, 77 FR 47536)			
17	EPA-450/2-78-029	Manufacture of Synthesized Pharmaceutical Products		Yes		
18	EPA-450/2-78-030	Manufacture of Pneumatic Rubber Tires		Yes		

¹⁹ See Table 1.

²⁰ See Table 1.

19	EPA-450/2-78-032	Factory Surface Coating of Flat Wood Paneling		Yes		
20	EPA-450/2-78-033	Graphic Arts-Rotogravure and Flexography		Yes		
21	EPA-450/2-78-036	Leaks from Petroleum Refinery Equipment		Yes		
22	EPA-450/2-78-047	Petroleum Liquid Storage in External Floating Roof Tanks		Yes		
23	EPA-450/2-78-051	Leaks from Gasoline Tank Trucks and Vapor Collection Systems	Rule 214 (3/8/2013, 78 FR 897)			
24	EPA-450/3-82-009	Large Petroleum Dry Cleaners		Yes		
25	EPA-450/3-83-006	Leaks from Synthetic Organic Chemical and Polymer Manufacturing Equipment		Yes		
26	EPA-450/3-83-007	Equipment Leaks from Natural Gas/Gasoline Processing Plants		Yes		
27	EPA-450/3-83-008	Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins		Yes		
28	EPA-450/3-84-015	Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry		Yes		
29	EPA-450/4-91-031	Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry		Yes		
30	EPA-453/R-96-007	Wood Furniture Manufacturing Operations		Yes		
31	EPA-453/R-94-032 61 FR 44050; 8/27/96	ACT Surface Coating Operations at Shipbuilding and Ship Repair Facilities Shipbuilding and Ship Repair Operations (Surface Coating)		Yes		
32	59 FR 29216; 6/06/94 EPA-453/R-97-004	NESHAPS Aerospace Manufacturing and Rework Coating Operations at Aerospace Manufacturing and Rework Operations		Yes		
33	EPA-453/R-06-001	Industrial Cleaning Solvents		Yes		
34	EPA-453/R-06-002	Offset Lithographic Printing and Letterpress Printing		Yes		
35	EPA-453/R-06-003	Flexible Package Printing		Yes		
36	EPA-453/R-06-004	Flat Wood Paneling Coatings		Yes		
37	EPA 453/R-07-003	Paper, Film, and Foil Coatings		Yes		

38	EPA 453/R-07-004	Large Appliance Coatings		Yes		
39	EPA 453/R-07-005	Metal Furniture Coatings		Yes		
40	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings Table 2 – Metal Parts and Products		Yes		
41	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings Table 3 – Plastic Parts and Products		Yes		
42	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings Table 4 – Automotive/Transportation and Business Machine Plastic Parts		Yes		
43	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings Table 5 – Pleasure Craft Surface Coating		Yes		
44	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings Table 6 – Motor Vehicle Materials		Yes		
45	EPA 453/R-08-004	Fiberglass Boat Manufacturing Materials		Yes		
46	EPA 453/R-08-005	Miscellaneous Industrial Adhesives		Yes		
47	EPA 453/R-08-006	Automobile and Light-Duty Truck Assembly Coatings		Yes		
48	EPA 453/B-16-001	Oil and Natural Gas Industry		Yes		

If no major non-CTG VOC/NO_x sources – adopt and submit negative declaration

	Yes	No
If no major non-CTG sources of VOC, District has submitted a negative declaration	X	
If no major non-CTG sources of NO _x , District has submitted a negative declaration	X	

If there are major non-CTG sources of VOC or NO_x, RACT rules must be in the SIP

(Not Applicable)