

AGENDA:
PCAPCD Board of Directors Meeting
Thursday, June 9, 2011, 3:00P.M.
Placer County Board of Supervisors' Chambers
175 Fulweiler Avenue, Auburn, California

**Call to Order

**Flag Salute

**Roll Call / Determination of a Quorum

**Done in previous special meeting for Proposed Budget

Approval of Minutes: April 14, 2011, Regular Board Meeting

Public Comment: Any person wishing to address the Board on any item <u>not</u> on the agenda may do so at this time.

Approval of Agenda

Consent: Items 1 & 2

These items are expected to be routine and non-controversial. The Board will act upon these items at one time without discussion. Any Board member, Staff member, or interested citizen may request that an item be removed from the consent calendar for discussion.

- 1. **Budget Revision**: Approve Budget Revision #11-02 (Biomass) thereby increasing the FY 2010-11 Budget by \$7,000 for expenditures associated with the consultant work for the DOE Placer County Biomass Utilization Project.
- 2. **District Credit Card Policy:** Adopt Resolution #11-11 thereby designating the Placer County Auditor-Controller to act as the approving official for Placer County credit card purchases made by the Air Pollution control Officer.

Action: Item 3

3. **RACT/SIP:** Adopt Resolution #11-12 thereby approving the 2011 Reasonably Available Control Technology State Implementation Plan Analysis Staff Report, dated June 2011, and adopt Resolution #11-13, thereby approving a Negative Declaration for Twenty-seven (27) source categories.

Information: Item 4

- **4. Air Pollution Control Officer Report** (Verbal reports and/or handouts will be provided)
 - a. Move update
 - b. Open house planned
 - c. Fiscal Update

Adjournment

Next Regularly Scheduled Board Meeting: - Thursday, August 11, 2011, 2:30 PM

Opportunity is provided for the members of the public to address the Board on items of interest to the public, which are within the jurisdiction of the Board. A member of the public wanting to comment upon an agenda item that is not a Public Hearing item should submit their name and identify the item to the Clerk of the Board.

Placer County Air Pollution Control District is committed to ensuring that persons with disabilities are provided the resources to participate fully in its public meetings. If you require disability-related modifications or accommodations, please contact the Clerk of the Board. All requests must be in writing and must be received by the Clerk five business days prior to the scheduled meeting for which you are requesting accommodation. Requests received after such time will be accommodated only if time permits.

District Office Telephone - (530) 745-2330



Board Agenda

Consent

Agenda Date: June 9, 2011

Prepared By: Jane Bailey, Fiscal Officer

Topic: Budget Revision #11-02, Second Amendment to the Professional Services

Agreement between the County of Placer and the District

Action Requested: Approve and authorize the Board Chair to sign Budget Revision #11-02, Attachment #1, on behalf of the Board, thereby increasing the FY 2010-11 Budget by \$7,000 for expenditures associated with the consultant work for the DOE Placer County Biomass Utilization Project.

Discussion: The District entered into a service agreement (Contract #12681) with the County of Placer to provide consultant services to the County for the DOE Placer County Biomass Utilization Project that began on November 1, 2008. The original service agreement was for \$89,000. The service agreement was amended the first time on July 27, 2009 to increase the contracted amount by \$6,150 for additional consultant services.

This second amendment (see Attachment #2) is to increase the contracted amount by \$7,000 for additional consultant services; thereby increasing the service agreement (Contract #12681) between Placer County Air Pollution Control District and the County of Placer to a total of \$102,150.

Fiscal Impact: If the Board approves and signs the Budget Revision #11-02, both the revenue from the County of Placer and the contracted service consultant expenditures will be increased by \$7,000.

Recommendation: It is the recommendation of the District Staff that the Board approve and authorize the Board Chair to sign Budget Revision #11-02, Attachment #1, thereby increasing the FY 2010-11 Budget by \$7,000 for expenditures associated with the consultant work for the DOE Placer County Biomass Utilization Project.

Attachment(s)

- #1: Budget Revision #11-02, Second Amendment to the Professional Services Agreement between the County of Placer and the District.
- #2: Second Amendment to the Professional Services Agreement for the DOE Placer County Biomass Utilization Pilot Project.

Attachment #1

SUBJECT:

Budget Revision #11-02

								PLACER C	COUNTY					PAS DOCUMENT NO.					
								BUDGET REV	/ISIC	N									
	Doc Type		otal \$ A	mount	Total Lines			Cash Transfer Rec	-	equire	d				Auditor-Controlle				
73	BR	\$	14	1,000.00	2		Establish Reserve Re			equired District Board									
ESTIMATED REVENUE ADJUSTMENT									APPR	OPRIA	TION ADJUSTM	ENT							
Dept No.	T Code	Rev	OCA	PCA	OBJ L-3	Proj. No.	G/L Sub GL	AMOUNT	Dept No.	T Code	Rev	OCA	PCA	Obj L-3	Proj. No.	G/L Sub GL		AMOUNT	
073	006		000040	90753	7292			\$7,000.00	73	014		000040	90753	2555	Professional Service	es	\$	7,000.00	
					TOTAL			7,000.00						TOTAL	-			7,000.00	
					To incre	ase the	professio	onal services contrac	ct (Cor	ntract	# 126	81) by \$	7,000 ar	nd to also	o increase the reven	ue to be red	ceive	ed from the Co	ounty of Placer
	by the	e saı	me amou	ınt.															
			District /	APCO										Date	;	6/9/2011			_
	bution pies to or		APCD D	istrict Bo	ard Chai	rman								Page	:	1			

Auditor-Controller

Rev 9/14/98

Budget Revision

#11-2

Attachment #2

SUBJECT:

Second Amendment to the Professional Services Agreement for the DOE Placer County Biomass Utilization Pilot Project

SECOND AMENDMENT TO PROFESSIONAL SERVICES AGREEMENT WITH PLACER COUNTY AIR POLLUTION CONTROL DISTRICT FOR DOE PLACER COUNTY BIOMASS UTILIZATION PILOT PROJECT

THIS SECOND AMENDMENT TO THE PROFESSIONAL SERVICES AGREEMENT (Contract 126812) is made and entered on this day of, 2011, by and between the COUNTY OF PLACER, hereinafter referred to as COUNTY, and PLACER COUNTY AIR POLLUTION CONTROL DISTRICT, hereinafter referred to as CONSULTANT.
WHEREAS, on November 1, 2008, COUNTY and CONSULTANT entered into a Contract whereby professional services would be provided to the COUNTY: and
WHEREAS, the parties have agreed to additional services to be provided by Consultant under said contract and compensation for those additional services.
NOW, THEREFORE, IT IS MUTUALLY AGREED by and among the parties as follows: 1. That paragraph 1 of the original Contract shall be amended to provide for the additional services and compensation as follows: a. The CONSULTANT agrees to perform the additional professional services as set forth in Exhibit "A" attached hereto and incorporated herein by reference, and the total compensation to be paid CONSULTANT for these additional services will result in an increase in the contract total of \$7,000, as set out in Exhibit "A". This second amended scope of work will result in an increase of \$7,000 in the contract amount so that the total contract amount of \$95,150 is increased to \$102,150." 2. The COUNTY agrees to pay to CONSULTANT \$102,150 as the sole compensation under the Contract and as amended by the First and Second Amendment. EXCEPT as specifically modified above, all of the remaining terms and conditions of the said Contract shall remain and continue in full force and effect.
COUNTY OF PLACER
By: Date: Thomas M. Miller, County Executive Officer
Approved as to Form
By: Date: Mark Rathe, Deputy County Counsel
PLACER COUNTY AIR POLLUTION CONTROL DISTRICT
By: Date:

Date: _____

Thomas J. Christofk, Director, Placer County Air Pollution Control District

EXHIBIT A

AMENDED SCOPE OF SERVICES COUNTY OF PLACER

AND

PLACER COUNTY AIR POLLUTION CONTROL DISTRICT FOR DOE PLACER COUNTY BIOMASS UTILIZATION PILOT PROJECT

As directed by the County Executive Officer, or his designee, perform the following additional tasks and duties as identified below.

Contractor agrees to do the following in conjunction with the Placer County Biomass Manager for DOE award # DE_FG36-08GO88026 "Placer County Biomass Utilization Pilot Project":

- 1. Provide consultation to complete the DOE Communications Plan.
- 2. Provide consultation to complete Business Plan.
- 3. Provide consultation to complete Project Guidebook.
- 4. Prepare information and public brochures to benefit the discussions of the proposed project.
- 5. Other activities as determined by County in support of the Project.

Charge out Hourly Rates

Senior Consultant

\$ 61.50 / hour (2011/2012)



Board Agenda

Consent

Agenda Date: June 9, 2011

Prepared By: Todd K. Nishikawa, Deputy Air Pollution Control Officer

Topic: Credit Card Usage Approval Procedure

Action Requested: Adopt Resolution #11-11, thereby designating and authorizing the Placer County Auditor-Controller to act as the approving official for Placer County credit card purchases made by the Air Pollution Control Officer (APCO).

Discussion: The District uses two Placer County credit cards. One is issued to Tom Christofk, APCO, and the other is issued to Todd Nishikawa, Deputy APCO.

The Placer County Credit Card Program provides an efficient method for selected staff to make authorized small dollar purchases of items and certain services that facilitate county business. The County's vendors also benefit from reduced paperwork and faster payment. The program eliminates requisitions and purchase orders for authorized purchases of \$2,500 or less and enables the County to make one monthly payment to the bank instead of multiple individual payments to a large number of vendors. Each card is embossed with the cardholder's name and organization. The card is strictly for official county use and may not be used for personal purchases.

The Placer County credit card is essentially a VISA credit card with greatly enhanced controls and data reporting which streamlines the traditional resource intensive procurement process for small dollar purchases and travel. The county credit card allows county departments, under strict guidelines, to make small purchases directly, without the necessity of preparing individual requisitions for each transaction, and to pay for prior approved travel. The benefits include more productive staff time, faster product delivery, improved customer satisfaction, faster supplier payment, fewer invoices, more predictable discounts, reduced administrative costs, and bank rebates based on prompt credit card payments and overall county credit card spending. Cardholders are directed to use the credit card where possible for low value purchases and county directed travel in order to achieve cost savings and reduce processing time. The cost of processing the credit card transaction is negligible compared to the approximate \$11.00 cost to issue a reimbursement check for a claim.

The County Credit Card Program Policies and Procedures Manual, which is followed by District Staff, provides for three levels of post-purchase management control:

- First, the cardholder retains receipts at the time of purchase and these are reconciled against the bankcard statement. The statement and receipts are then forwarded to the appropriate approver.
- Second, the approver certifies that the monthly credit card reports and associated paperwork from each of their assigned cardholders are correct and that all purchases were authorized.

Third, each department's Billing Official reviews all of the department's cardholders'
monthly account statements for accuracy, reconciles them with the corporate account
summary received through the mail from the bank, and then reconciles differences with
the Auditor-Controller.

The second level of post-purchase control for the District's two cards is exercised by the APCO's review of Placer County credit card purchases by the Deputy APCO, and the Deputy APCO's review of the Placer County credit card purchases made by the APCO. While the practice of having the APCO's purchases approved by a subordinate, the Deputy APCO, was consistent with previous county policies, it does not satisfy the County's policy adopted November 23, 2010, nor is it a good internal control practice.

The Placer County Auditor-Controller, who is the designated county credit card approver for all elected officials in Placer County government, has agreed to serve as the approving official for county credit card purchases by the APCO. Accordingly, District management is requesting that the District Governing Board designate the Placer County Auditor-Controller, currently Katherine J. Martinis, as the approving official for the county credit card purchases of the Air Pollution Control Officer. This procedure is in keeping with procedures adopted by Placer County, as outlined in an April 18, 2011, memorandum (see Attachment #2).

Fiscal Impact: No direct fiscal impact. This action would improve the internal controls over county credit card usage by the APCO by making the approving official the Placer County Auditor-Controller, who is an elected official and a person who is not subordinate to the APCO.

Recommendation: Staff recommends the adoption of Resolution #11-11, thereby designating and authorizing the Placer County Auditor-Controller to be the approving official for Placer County credit card purchases made by the Air Pollution Control Officer.

Attachment(s):

- #1: Resolution #11-11, designating the Placer County Auditor-Controller as the Approving Official for county credit card purchases of the Air Pollution Control Officer.
- #2: Memorandum dated April 18, 2011, Thomas M. Miller, Placer County Executive Officer, and Katherine J. Martinis, Auditor-Controller, "Newly Amended Placer County Credit Card Program Policies and procedures".

ATTACHMENT #1

SUBJECT:



Board Resolution:

Resolution # 11-11

Before the Placer County Air Pollution Control District Board of Directors

In the Matter Of:

A Resolution Designating the Placer County Auditor-Controller as the Approving Official for County Credit Card Purchases made by the Air Pollution Control Officer.

The following Resolution was duly passed by the Placer County Air Pollution Control District Board of Directors at a regular meeting held on **June 9**, **2011**, by the following vote:

Ayes:	Holmes, M	Barkle	Nader_	Weygandt	Ucovich
	Holmes, J.	Hill	Montgome	ry Garcia	-
Noes:	Holmes, M	Barkle	Nader	Weygandt	Ucovich
	Holmes, J.	Hill	Montgome	ry Garcia	_
Abstain:	Holmes, M	Barkle	Nader_	Weygandt	Ucovich
	Holmes, J.	Hill	Montgome	ry Garcia	-
Signed a	nd approved by me	after its pas	sage:	Chairman of the Placer C Control District Board of	•
Attest: C	Clerk of said Board				

WHEREAS, Placer County Credit Cards provide an efficient and cost saving means for small purchases and travel arrangements to be made by District management; and

WHEREAS, the District utilizes the "Placer County Credit Card Program Policies and Procedures Manual" to provide internal control over the use and approval of County Credit Cards issued to District Staff; and

WHEREAS, the Air Pollution Control Officer may approve all County Credit Card purchases made by subordinate District Staff; and

WHEREAS, Placer County procedures provide that the Placer County Auditor-Control shall be the approving official for County credit card purchases of County elected officials; and

WHEREAS, the Placer County Auditor-Control has agreed to serve as the approving official for purchases made by the APCO and these approvals would satisfy "Placer County Credit Card Program Policies and Procedures Manual" and internal control requirements; and

WHEREAS; the District Board wishes to designate the Placer County Auditor-Controller as the approver for the Placer County Credit Card purchases of the APCO, and to authorize the Auditor-Controller approve, deny, or correct, the County Credit Card purchases of the APCO.

BE IT RESOLVED AND ORDERED that the Placer County Air Pollution Control District's Board of Directors hereby designates and authorizes the Placer County Auditor Controller to approve the Placer County Credit card purchases of the Air Pollution Control Officer as part of the post-purchase controls over credit card use.

ATTACHMENT #2

SUBJECT:

Memorandum April 18, 2011, "Newly Amended Placer County Credit Card Program Policies and procedures"



MEMORANDUM OFFICE OF COUNTY EXECUTIVE COUNTY OF PLACER Thomas M. Miller, CEO

MEMORANDUM

OFFICE OF
AUDITOR-CONTROLLER
COUNTY OF PLACER
Katherine J. Martinis, CPA
Auditor-Controller

TO:

Honorable Elected Officials and, Appointed Department Heads

FROM:

Thomas M. Miller, County Executive Officer

Katherine J. Martinis, Auditor-Controller

DATE:

April 18, 2011

SUBJECT: Newly Amended Placer County Credit Card Program Policies & Procedures

As you may recall, on November 23, 2010 the Board of Supervisors adopted a resolution amending the Placer County Credit Card Program Policies and Procedures Manual. One of the more significant changes to the policy was new provisions for approval of department head credit card usage. The purpose of this memo is to explain the rationale behind the change and how the new process will work.

The old policy stated that a Department Head's approving official would be their assistant. This practice is in violation of basic internal control principles and lends itself to potential fraud or abuse. The amended policy states that "the County Executive Officer will be the Approver for all appointed Department Heads. The Chairman of the Board will be the Approver for the County Executive Officer and will designate the Approvers for all Elected Officials...". Our current Board Chair, Supervisor Weygandt, has designated the Auditor-Controller as approving official for all elected officials, including the Supervisors. In addition, Supervisor Weygandt will be the approving official for the Auditor.

Effective immediately, the procedure for department head and supervisor credit card approval will be as follows:

- 1. The cardholder should review the monthly Account Statement for accuracy and compliance with all County policies.
- 2. If there are errors on the bill, take whatever steps are necessary to correct the errors and attach and explanation of the error and corrective action to the statement.
- 3. Attach all receipts/invoices supporting the charges in the same order they appear on the statement.
- 4. If you incur non-allowable credit card charges, (e.g. if you exceed the daily meal per diem), give your personal check to your Department Billing Official who will complete a Deposit Permit. A copy of your check and the completed Deposit Permit should be attached to the Account Statement.
- 5. Sign and date the Account Statement indicating that you have confirmed all charges are accurate.

Honorable Elected Officials and Appointed Department Heads Newly Amended Placer County Credit Card Program Policies & Procedures Page 2 of 2 April 18, 2011

- 6. Both elected and appointed department heads forward the entire packet to the CEO for review.
- 7. CEO will review and approve appointed department heads statements and return the packet to your department for retention.
- 8. CEO will forward statements of elected officials to the Auditor-Controller. The Auditor will review and approve the statements and return the packet to your department for retention.

Strengthening internal controls in this fashion will mitigate risks for both department heads and their subordinates, as well as provide our constituents greater assurance of our transparency and integrity.

Thomas M. Miller, County Executive Officer

Katherine J. Martinis, Auditor - Controller



Board Agenda

Action

Agenda Date: June 9, 2011

Prepared By: Bruce Springsteen, Acting Manager of Compliance and Enforcement

Topic: 2011 RACT SIP Analysis. Approval of the 2011 Reasonably Available

Control Technology State Implementation Plan Analysis Staff Report,

dated June 2011.

Action Requested:

1) Adopt Resolution #11-12 (Attachment #1), thereby approving the 2011 Reasonably Available Control Technology State Implementation Plan Analysis Staff Report, dated June 2011

2) Adopt Resolution #11-13 (Attachment #2), thereby approving a Negative Declaration for Fifteen (15) source categories.

Discussion: Portions of the Placer County Air Pollution Control District (District) are classified as "severe" non-attainment with the national eight-hour ozone ambient air quality standard (as well as non-attainment with the California ozone standard). As such, the District is required by the U.S. Environmental Protection Agency to periodically demonstrate that the District's State Implementation Plan (SIP) rules fulfill Reasonably Available Control Technology (RACT) requirements for volatile organic compounds (VOC) and nitrogen oxides (NOx). The District has updated the RACT SIP analysis and the findings are contained in a Staff Report titled "2011 Reasonably Available Control Technology State Implementation Plan Analysis" (RACT SIP Analysis), dated June 2011 (Attachment #3). RACT requires that District rules cover both: (1) source categories for which there is RACT guidance and for which there are affected sources that operate in the District, and (2) major sources in the District. The analysis involved a comparison of all RACT guidance documents with existing District rules and sources that operate in the District. The RACT SIP analysis found the need for the following District rule additions and revisions:

- New rules: Development and adoption of one (1) new District rule:
 - Rule 249, PLASTIC PARTS COATING.
- Amendment of existing rules: Applies to seven (7) existing District rules:
 - Rule 216, ORGANIC SOLVENT CLEANING AND DEGREASING
 - Rule 217, CUTBACK AND EMULSIFIED ASPHALT PAVING MATERIALS
 - Rule 227, PETROLEUM DRY CLEANING
 - Rule 233, BIOMASS BOILERS
 - Rule 235, ADHESIVES
 - Rule 239, GRAPHIC ARTS OPERATIONS
 - Rule 240, SURFACE PREPARATION AND CLEANUP

2011 RACT SIP Analysis June 9, 2011 Page 2

• <u>Negative declarations</u>: Negative declarations that there are no sources in the District that are affected by RACT guidance have been determined for fifteen (15) source categories, listed in Table 4 of the RACT SIP Analysis Staff Report, dated June 2011.

Extensive public outreach with all impacted stakeholders will be performed when each recommended rule revision is conducted.

Fiscal Impact: The fiscal impact of the new rules and rule revisions that are recommended as part of the RACT SIP analysis will be evaluated in detail with each separate future rulemaking action. The fiscal impact will be provided to the Board for consideration, evaluation and approval prior to any potential Board rulemaking adoptions that are recommended in the RACT SIP analysis.

Recommendation: Staff recommends that the District Board adopt Resolutions #11-12 and #11-13 thereby approving the findings of the District Staff Report of the 2011 Reasonably Available Control Technology State Implementation Plan Analysis, dated June 2011.

Attachment(s) #1: Resolution #11-12

#2: Resolution #11-13

#3: 2011 Reasonably Available Control Technology State Implementation Plan Analysis, District Staff Report, dated June 2011

Attachment #1

SUBJECT:



Board Resolution:

Resolution # 11-12

Before the Placer County Air Pollution Control District Board of Directors

In the Matter Of:

A Resolution adopting the findings of the 2011 Reasonably Available Control Technology State Implementation Plan (RACT SIP) Analysis, District Staff Report, dated June 2011.

The following Resolution was duly passed by the Placer County Air Pollution Control District Board of Directors at a regular meeting held on **June 9, 2011,** by the following vote:

Ayes:	Holmes, M	_ Barkle	Nader	Weygandt	_ Ucovich
	Holmes, J.	Hill	_ Montgomery	Garcia	
Noes:	Holmes, M	Barkle	Nader	Weygandt	_ Ucovich
	Holmes, J.	Hill	_ Montgomery	Garcia	<u> </u>
Abstain:	Holmes, M	Barkle	Nader	Weygandt	_ Ucovich
	Holmes, J.	Hill	_ Montgomery	Garcia	
Signed a	and approved by me	after its pas		Chairman of the Place Control District Board	r County Air Pollution of Directors
Attest: C	Clerk of said Board				

WHEREAS, Section 40001 of the Health and Safety Code of the State of California authorizes the Placer County Air Pollution Control District (District) to adopt and enforce Rules and Regulations to achieve and maintain ambient air quality standards within the District; and

WHEREAS, Section 40702 of the Health and Safety Code of the State of California requires a district to adopt rules and regulations and do such acts as may be necessary or proper to execute the powers and duties granted; and

WHEREAS, Portions of the District have been designated as "severe" non-attainment areas for the federal 8-hour ozone standard pursuant to the Federal Clean Air Act Amendments of 1990 (CAAA); and

WHEREAS, The CAAA requires for non-attainment areas the implementation of volatile organic compounds (VOC) and nitrogen oxides (NOx) Reasonably Available Control Technology (RACT) rules covering: (1) all source categories with RACT guidance documents, for which there are sources in the District that fall under the RACT guidance, and (2) for Major Sources of VOC and NOx; and

WHEREAS, The Board of Directors of the District has determined that adopting the findings of the 2011 RACT SIP Analysis are necessary to comply with requirements of California Health and Safety Code Sections 40001 and 40910, and with Sections 110(a)(2), 110(f) and 182(b)(2) of the CAAA; and

WHEREAS, The relative cost effectiveness of the recommended rulemakings will be evaluated separately from the 2011 RACT SIP Analysis, when the rulemakings are adopted by the Board, as well as other factors, as required by Section 40922 of the Health and Safety Code of the State of California, and at that time reasonable efforts will be made to determine the direct costs expected to be incurred by regulated parties pursuant to Section 40703 of the Health and Safety Code of the State of California; and

NOW, THEREFORE, BE IT RESOLVED, That this Board approves and adopts the findings of the 2011 Reasonably Available Control Technology State Implementation Plan (RACT SIP) Analysis, District Staff Report, dated June 2011, and directs the Placer County Air Pollution Control District to implement the RACT SIP Analysis recommendations.

Attachment #2

SUBJECT:



Board Resolution:

Resolution # <u>11-</u>13

Before the Placer County Air Pollution Control District Board of Directors

In the Matter Of:

The "Negative Declaration" of "No Sources to Regulate for Volatile Organic Compounds (VOC) or Nitrogen Oxides (NOx)" for fifteen (15) source categories, for which there is Reasonably Available Control Technology (RACT) guidance, and for which there are either no operating facilities (sources) within the District or no facilities(sources) with emissions that exceed the RACT guidance threshold; and the submittal of this "Negative Declaration" as a requested revision to the State Implementation Plan (SIP).

The following Resolution was duly passed by the Placer County Air Pollution Control District Board of Directors at a regular meeting held on **June 9, 2011**, by the following vote:

Ayes:	Holmes, M	Barkle	Nader	_ Weygandt	Ucovich
	Holmes, J.	Hill	Montgomery	Garcia	_
Noes:	Holmes, M	Barkle	Nader	_Weygandt	Ucovich
	Holmes, J.	Hill	Montgomery	Garcia	_
Abstain:	Holmes, M	Barkle	Nader	_ Weygandt	Ucovich
	Holmes, J.	Hill	Montgomery	Garcia	_
Signed a	nd approved by me	after its pas	sage:		
				rman of the Placer trol District Board of	County Air Pollution of Directors
Attest: C	Clerk of said Board				

WHEREAS, Section 40001 of the Health and Safety Code of the State of California authorizes the Placer County Air Pollution Control District (District), to adopt and enforce Rules and Regulations to achieve and maintain ambient air quality standards within the District; and

WHEREAS, Section 40702 of the Health and Safety Code of the State of California requires a district to adopt rules and regulations and do such acts as may be necessary or proper to execute the powers and duties granted; and

WHEREAS, Portions of the District have been designated as "severe" non-attainment areas for the federal 8-hour ozone standard pursuant to the Federal Clean Air Act Amendments of 1990 (CAAA); and

WHEREAS, The CAAA requires for non-attainment areas the implementation of volatile organic compounds (VOC) and nitrogen oxides (NOx) Reasonably Available Control Technology (RACT) rules covering: (1) all source categories with RACT guidance documents, for which there are applicable sources in the District, and (2) for Major Sources of VOCs and NOx; and

WHEREAS, The Board of Directors of the District has determined in the 2011 RACT SIP Analysis that there are either no sources that operate in the District, or no sources exceed RACT Guidance emissions thresholds, in the fifteen (15) source categories of: (1) Aerospace Coatings, (2) Automobile and Light-duty Truck Assembly Coatings, (3) Fiberglass Boat Manufacturing, (4) Flexible Package Printing, (5) Large Appliances Surface Coatings, (6) Magnet Wire, (7) Metal Furniture Coatings, (8) Natural Gas / Gasoline Processing, (9) Paper and Fabric, (10) Paper, Film, and Foil Coatings, (11) Pharmaceutical Products, (12) Refineries, (13) Rubber Tire, (14) Ships/Marine Coating, and (15) Synthetic Organic Chemicals; and

WHEREAS, The Board of Directors of the District has determined that the adoption of a "Negative Declaration" for the above specified fifteen (15) specified categories is necessary to comply with requirements of California Health and Safety Code Sections 40001 and 40910, and with Title 1, Part D, Subpart 2, Section 182(b)(2), of the 1990 Federal Clean Air Act Amendments for the submittal of Reasonable Available Control Technology (RACT) rules; and

WHEREAS, the "Negative Declaration" findings are categorically exempt from CEQA pursuant to Title 14, California Administrative Code, Section 15308, as an action by a regulatory agency for the protection of the environment;

NOW THEREFORE BE IT RESOLVED, that this Board approves and adopts this "Negative Declaration" certifying that in the District there are either no sources or no sources that exceed RACT guidance emission thresholds for fifteen (15) source categories, and therefore the "Negative Declaration" is made that the requirements of Section 182(b)(2) of the CAAA are not presently applicable to the District:

- 1) Aerospace Coatings
- 2) Automobile and Light-duty Truck Assembly Coatings
- 3) Fiberglass Boat Manufacturing
- 4) Flexible Package Printing
- 5) Large Appliances Surface Coatings
- 6) Magnet Wire
- 7) Metal Furniture Coatings

- 8) Natural Gas / Gasoline Processing
- 9) Paper and Fabric
- 10) Paper, Film, and Foil Coatings
- 11) Pharmaceutical Products
- 12) Refineries
- 13) Rubber Tire
- 14) Ships/Marine Coating
- 15) Synthetic Organic Chemicals

BE IT FURTHER RESOLVED, that the Air Pollution Control Officer is hereby authorized and directed to submit this "Negative Declaration" as a requested revision to the State Implementation Plan, in the form required by the California Air Resources Board and the United States Environmental Protection Agency, on behalf of the Placer County Air Pollution Control District.

BE IT FURTHER RESOLVED, each part of this "Negative Declaration" is deemed severable, and in the event that any part of this "Negative Declaration" is held to be invalid, the remainder of this "Negative Declaration" continues in full force and effect.

Attachment #3

SUBJECT:

2011 Reasonably Available Control Technology State Implementation Plan Analysis, District Staff Report, dated June 2011

PLACER COUNTY AIR POLLUTION CONTROL DISTRICT

STAFF REPORT

2011 Reasonably Available Control Technology State Implementation Plan Analysis

June 2011

BACKGROUND

Purpose

The Placer County Air Pollution Control District (District) is required to update the Reasonably Available Control Technology State Implementation Plan ("RACT SIP") analysis. This requirement results from the District's classification as "severe" non-attainment with the national eight-hour ozone ambient air quality standard, and also non-attainment with the State of California ozone standard.

District Air Quality Attainment Status

The District's jurisdiction is all of Placer County. Placer County is located in northern California, bordering Sacramento County to the west and the State of Nevada on the east. Elevations range from near sea level in the western portion of the County to 9,000 feet in the mountains of the Sierras. Placer County is the only county in the state that is divided into three different air basins: the Sacramento Valley Air Basin (SVAB); the Mountain Counties Air Basin (MCAB); and the Lake Tahoe Air Basin (LTAB). Each air basin has its own meteorological and geographic conditions. Generally, the Mediterranean climate in SVAB has summers that are hot and dry with temperature regularly above 90°F. These hot and dry summers are conducive to ozone formation. Prevailing winds from the west transport ozone from the San Francisco Bay Area and the Sacramento Valley into the foothill and mountain areas.

The portions of Placer County in the SVAB and MCAB are included in the Sacramento Federal Ozone Non-Attainment Area (SFONA). The SFONA has been classified as "severe" non-attainment for the National Ambient Air Quality Standard (NAAQS) for eight-hour ozone, as well as non-attainment with the State of California Ambient Air Quality Standard for ozone.

Federal RACT SIP Requirement

The U.S. Environmental Protection Agency's (U.S EPA) Phase 2 Ozone Rule (40 CFR 51.912 and 70 FR 71612) 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 (NOx) 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 emissions limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility" (44 FR 53762). The implementation of RACT requires:

- Rules covering source categories with RACT guidance documents (including Control Techniques Guideline (CTG)) issued by U.S. EPA, for which there are sources in the District that have emission levels that trigger the RACT guidance document threshold.
- Rules covering all major sources 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.

State of California Ozone Reduction Requirements

In addition to federal SIP requirements, the District has chosen to implement "every feasible measure" (EFM) to meet the ozone reduction requirements under State of California Health and Safety Code Section 40914(a)(2). The State of California suggests that EFMs consider

regulations that have been successfully implemented elsewhere; consider new technologies and innovative approaches; and social, environmental, energy, and economic (cost effectiveness) factors.

Additionally, the District requires the use of Best Available Retrofit Control Technology (BARCT) for VOC and NOx as required under State of California Health and Safety Code Section 40919.

District Planning History

The District has adopted numerous air quality attainment plans since 1991 to move toward attainment of the NAAQS for ozone. Over 100 new rules and amendments have been adopted to meet the commitments in these attainment plans. The District works with other air districts in SFONA under an "Eight-Hour Ozone Attainment Plan".

Title	Board Adoption
1991 Placer County Air Quality Attainment Plan	March 1992
1994 Ozone Attainment Demonstration Plan	December 1994
1997 Triennial Progress Report	July 1998
1999 Sacramento Area Regional Milestone Report	April 2000
2000 Triennial Progress Report	April 2001
2002 Sacramento Area Regional Milestone Report	May 2003
2003 Triennial Progress Report	October 2005
Sacramento Regional Non-Attainment Area Eight-Hour Ozone Rate-of-Progress Plan	February 2006
Sacramento Regional Non-Attainment Area Eight-Hour Ozone and Reasonable Further Progress Plan	December 2008

District RACT SIP History

The District last conducted a RACT SIP analysis in 2006. This analysis required a new rulemaking for the Metal Parts and Products source category, which was accomplished by the District through new District Rule 245, SURFACE COATING OF METAL PARTS AND PRODUCTS, adopted on 12/11/08, amended on 08/20/09, and recently SIP approved by U.S. EPA. The analysis also found that nine (9) District rules required re-submittal for SIP approval due to amendments that predated the last SIP approval, and nine (9) District rules that needed first-time SIP approval. The District is in the process of getting the rules into the approved SIP, and are under on-going state and U.S. EPA review.

The 2006 RACT SIP analysis was followed by a subsequent partial update in 2008, in response to seven (7) new CTGs.

ANALYSIS METHODOLOGY

RACT SIP

The RACT SIP analysis involves the following procedures, consistent with U.S. EPA Region IX guidance (as contained in a letter from Andrew Steckel dated March 9, 2006):

- <u>Source Category Identification</u>: Identify all source categories in the District that require RACT. This must include:
 - Source categories which have RACT guidance, and for which any sources (either minor or major) operate in the District.

- Source categories for which major sources of NOx or VOC operate in the District.
- RACT Determination: For each source category that requires RACT, identify if there is a District Rule. If there is no rule, then a new District rule that meets RACT must be developed and promulgated. If there is an existing District rule, then a determination must be made if the existing District rule reflects RACT. This is based on an analysis of the applicable District rule with guidance and regulations used to establish RACT:
 - Federal U.S. EPA: Control Technique Guidelines (CTG), Alternative Control Techniques (ACT), Maximum Achievable Control Technology (MACT) and National Emissions Standards Hazardous Air Pollutant (NESHAP) Standards, and New Source Performance Standards (NSPS).
 - State: State of California Suggested Control Measures, and State RACT guidance.
 - Local: Air Districts in our region.

The RACT determination will identify for each source category:

- Existing District rules that meet RACT.
- Existing District rules that require amendments to meet RACT.
- New rules required to meet RACT.
- <u>Negative Declaration</u>: Negative declarations are required for all source categories for which
 there is federal RACT guidance but for which there are no operating facilities (major or
 minor) within the District, or for which there are facilities that have emissions below the
 RACT guidance threshold.

To determine that there are no operating facilities in the District that fall under a source category with RACT guidance, the following checks were conducted:

- District internal database of permitted sources.
- Internet website searches for key words.
- Business listings through city and county databases.
- Industrial trade groups.
- Yellow pages.

Every Feasible Measure

The EFM determination is based on a comparison of existing District rules with those in other districts in the Sacramento region.

RACT ANALYSIS

Identification of Source Categories

Source categories considered for the RACT SIP analysis include:

• All source categories that are affected by RACT guidance documents that have been published by the U.S. EPA. There are a total of forty-nine (49) source categories with RACT guidance documents -- including 36 CTGs, 10 ACTs, and 3 others (NSPS, MACT).

- All source categories are affected by existing District rules that limit NOx or VOC. There are a total of twenty-seven (27) District rules that limit NOx or VOC.
- All major sources that operate in the District. District Rule 502, NEW SOURCE REVIEW, defines major sources as those with permitted potential to emit greater than 25 tons per year of NOx or VOC. There are five major sources in the District Rio Bravo Rocklin, Sierra Pacific Industries, SierraPine Ltd., PABCO/Gladding McBean, and Roseville Electric Energy Park. These sources represent three categories with existing District rules that control NOx and VOC: Rule 233, BIOMASS BOILERS, Rule 229, FIBERBOARD MANUFACTURING, and Rule 250, STATIONARY GAS TURBINES.

RACT Determination

Existing District Rules Meet RACT

Table 1 lists the seventeen (17) source categories for which there is an existing District rule that has been determined to satisfy RACT requirements. The table contains the following information: source category title; applicable federal guidance title, report number, and date; existing District rule number, title, and date of last rule amendment, if any; status and size of operating sources in the District; SIP approval status of the most recent District rule amendment, including Federal Register citation and publication date; and narrative discussion forming the basis for the determination that the rule meets RACT.

The table is divided into two sections:

- District rules for which the latest rule amendment has been SIP approved by U.S. EPA.
 These rules have been determined to meet RACT requirements because they have been
 reviewed and approved by the State of California Air Resources Board and U.S. EPA,
 and there has been no more-recent RACT guidance issued for the source category since
 the rule was SIP approved by U.S. EPA. Also, the rules have been determined to be
 consistent with state and regional District rules.
- District rules for which the last amendment has not been SIP approved by U.S. EPA.
 These rules have been determined to meet RACT because they meet the most recent
 RACT guidance, and have been determined to be consistent with state and regional
 district rules.

Determination that the existing District rules meet the applicable RACT guidance documents is made through a detailed comparison of the District rule with the RACT guidance document compliance requirements including control measures through recommended limits on the volatile organic content of coatings and other VOC containing products, control device efficiency limitations, NOx limits from fuel combustion sources, recordkeeping and reporting, and test methods.

Determination that existing District rules are consistent with regional district rules is made through a survey and contact with Districts in our region, including Sacramento, El Dorado, and Yolo-Solano.

Existing District Rules to be Amended

Table 2 lists the seven (7) existing District rules that have been determined to need amendment to meet RACT:

- Rule 216, ORGANIC SOLVENT CLEANING AND DEGREASING
- Rule 217, CUTBACK ASPHALT

- Rule 227, PETROLEUM DRY CLEANING
- Rule 233, BIOMASS BOILERS
- Rule 235, ADHESIVES
- Rule 239, GRAPHIC ARTS OPERATIONS
- Rule 240, SURFACE PREPARATION AND CLEANUP

New District Rules

Table 3 lists the one (1) new District rule that is required to meet RACT: Plastic Parts Coating, planned to be Rule 249, PLASTIC PARTS COATING

Negative Declarations

Table 4 lists the fifteen (15) source categories for which there is RACT guidance (CTG), but for which the District has determined there are no sources in the category, or if any sources were found, the source's potential VOC and NOx emissions are less than the RACT guidance threshold.

If such sources locate in the District in the future they will be subject to New Source Review requirements under District Rule 502, NEW SOURCE REVIEW. These requirements would be significantly more stringent than RACT.

Table 4 also lists twelve (12) source categories for which there is ACT guidance, but for which the District does not have any such sources.

Existing District Rules to be Rescinded

Table 5 lists the three (3) existing District rules that are to be rescinded. There are no longer any sources operating in the District under these rules:

- Rule 230, PLASTIC PRODUCTS AND MATERIALS PAPER TREATING OPERATIONS
- Rule 232, BIOMASS SUSPENSION BOILERS
- Rule 241, BOILERS AT PLASTIC LAMINATE MANUFACTURING FACILITIES

Every Feasible Measure

Table 6 lists all source categories for which the state has identified the requirement of an evaluation for the need of Every Feasible Measure. It has been determined that existing District rules, and new District rules or amendments that will be the outcome of the above analysis of this report, satisfy EFM requirements, as documented in Table 6.

New Rules to be Adopted to Meet "Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan"

The District has committed to two new rules as part of our "Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan" (Regional Attainment Plan):

- Asphalt Concrete, planned to be Rule 248
- Large Water Heaters and Small Boilers, planned to be Rule 247

The Regional Attainment Plan is currently undergoing revisions, which may result in: (1) selection of new rulemakings for additional source categories, and (2) reconsideration of the cost effectiveness and need for the two planned rules.

Tentative Adoption Schedule

Table 7 lists the three new rules, and seven existing rules requiring amendment, and the tentative scheduled date for which the rule will be adopted and submitted to the state for SIP approval.

MISCELLANEOUS RULES CHANGES - ADMINISTRATIVE AND NON RACT SIP

District rules that are not related to the RACT SIP analysis, that require amendments have also been identified, and are listed in Table 8. They are separated into two sections:

- <u>Administrative</u> Rules requiring changes that are administrative typographical errors, formatting, consistency, clarifications, and other changes that do not affect rule compliance, and will not require SIP approval.
- <u>SIP Approval</u> Rules that are not required for the RACT SIP and that require changes that will need SIP approval.

ANALYSIS

The following Analysis and the subsequent Findings are intended to address the requirements set forth in the California Health and Safety Code relating to adoption of RACT SIP Analysis (and new or amended District rules), as well as other state statutes referenced herein.

1. Cost-Effectiveness of a Control Measure

California Health & Safety Code (H&S) Section 40703 requires the District to consider and make public the "cost-effectiveness" of District control measures. The cost effectiveness of the RACT SIP Analysis findings and recommendation -- the new rules and rule amendments needed to meet RACT -- will be assessed in detail when each of the separate rules are developed and adopted by the Board in the future to ensure that they are acceptable. There is no immediate cost impact of these RACT SIP Analysis recommendations.

2. Socioeconomic Impact

H&S Section 40728, in relevant part, requires the Board to consider the socioeconomic impact of any new or amended rule if air quality or emission limits are significantly affected. The expected socioeconomic impact of the RACT SIP Analysis (and new rules and rule amendments to meet RACT) will be assessed when the rules are adopted to ensure that they are acceptable.

3. Environmental Review and Compliance

California Public Resources Code Section 21159 requires that an environmental analysis of the reasonably foreseeable methods of compliance should be conducted. The RACT SIP analysis (and new rules and rule amendments required to meet RACT) will reduce emissions from sources and will not cause any significant adverse effects on the environment. There are no adverse environmental impacts that will be caused by compliance with the new rules and rule amendments. Nonetheless, an environmental review will be conducted at the time each rule or rule amendment is proposed for adoption.

The RACT SIP analysis is exempt from the California Environmental Quality Act (CEQA) because: (1) it can be seen with certainty that there is no possibility that the activity in question may have a significant adverse effect on the environment (CEQA Guidelines §15061(b)(3)); and (2) it is an action by a regulatory agency for protection of the environment (Class 8 Categorical Exemption, CEQA Guidelines §15308).

FINDINGS

- A. Necessity: The adoption of RACT SIP analysis satisfies the District's objective to reduce VOCs to achieve attainment with ambient air standards for ozone, and meets the District's requirements to implement "every feasible measure" as required under California Health and Safety Code Sections 40919.
- B. Authority: California Health and Safety Code, Sections 40000, 40001, 40701, 40702, 40716, 41010, and 41013, are provisions of law that provide the District with the authority to adopt this RACT SIP analysis.
- C. Clarity: There is no indication at this time that the RACT SIP analysis is written in such a manner that persons affected by the analysis cannot easily understand them.
- D. **Consistency:** The RACT SIP analysis is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations.
- E. **Non-Duplication:** The RACT SIP analysis does not impose the same requirements as an existing state or federal regulation.
- F. **Reference:** All statutes, court decisions, and other provisions of law used by the District in interpreting this RACT SIP analysis is incorporated into this analysis and this finding by reference.

SUMMARY

The RACT SIP analysis has determined the need for the following District rule updates, which District Staff recommends as future actions:

- New rules. Development and adoption of one (1) new District rule: Plastic Parts Coating.
- Amendment of existing rules. Amendment and adoption of seven (7) existing District rules: Rule 235, ADHESIVES; Rule 233, BIOMASS BOILERS; Rule 217, CUTBACK ASPHALT; Rule 227, PETROLEUM DRY CLEANING; Rule 239, GRAPHIC ARTS OPERATIONS; Rule 216, ORGANIC SOLVENT CLEANING AND DEGREASING; Rule 240, SURFACE PREPARATION AND CLEANUP.
- <u>Negative declaration</u>. Negative declarations that there are no existing sources in the District or sources that emit above the RACT guidance (CTG) threshold limit for the fifteen (15) source categories, listed in Table 4.
- <u>Rescinding rules</u>. Three (3) existing rules are to be rescinded because sources no longer operate in the District: Rule 232, BIOMASS SUSPENSION BOILERS; Rule 241, BOILERS AT PLASTIC LAMINATE MANUFACTURING FACILITIES; Rule 230, PLASTIC PRODUCTS AND MATERIALS PAPER TREATING OPERATIONS.

Rules requiring amendment, for reasons other than the RACT SIP analysis, have also been identified, shown in Table 8.

Table 1. Existing District Rules that have Been Determined to Meet RACT

Source Category	RACT Guidance Document Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Analysis Used to Determine that the Rule Meets RACT
District Rules that	are Approved in the California SIP				
Fiberboard Manufacturing		Rule 229, Fiberboard Manufacturing (06/28/94)	Major (non-CTG source)		Rule 229 (06/28/94) meets RACT. There is no available federal CTG guidance for this category. The Rule was SIP approved on 06/08/01. We are not aware of any current state or local rules that have more stringent VOCs limits for this source category.
Gasoline Bulk Plants and Terminals	Control of Volatile Organic Emissions from Bulk Gasoline Plants (EPA-450/2-77-035, 12/77); Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals (EPA-450/2-77-026, 12/77); NESHAP Subparts CCCCCC, Gasoline Dispensing Facilities (Area Sources) (1/10/08), R, Gasoline Distribution (Stage 1) (12/14/94), BBBBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (Area Sources) (01/10/08)	Gasoline into	Minor		Rule 215 (06/19/97) meets RACT. Rule 215 meets the CTG. It was recently SIP approved on 01/31/11.

Table 1. Existing District Rules that have Been Determined to Meet RACT

Source Category	Technique Guidelines (CTG),	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Analysis Used to Determine that the Rule Meets RACT
Gasoline Service Stations (Storage Tanks)	Design Criteria for Stage I Vapor Control Systems – Gasoline Service Stations (11/75); Control of Volatile Organic Compound (VOC) Equipment Leaks from Natural Gas/Gasoline Processing Plants (EPA-450/3-83-007, 12/83); Technical Guidance – Stage II Vapor Recovery Systems for Control of Vehicle Refueling Emissions at Gasoline Dispensing Facilities (EPA-450/3-91-022a, 11/91); Control of VOC Leaks from Gasoline Tank Trucks and Vapor Collection Systems (EPA-450/2-78-051, 12/78)	Rule 213, Gasoline Transfer into Stationary Storage Containers (10/19/93)	Minor	62 FR 23365 (04/30/97), for Rule 10/19/93.	Rules 213 (10/19/93) meets RACT. Rule 213 meets all current California requirements for this source category including recent rules for Phase I Enhanced Vapor Recovery system. The Rule was SIP approved on 04/30/97.
Gas Turbines	NOx Emissions from Stationary Gas Turbines (EPA-453/R-93-007, 01/93)	Rule 250, Stationary Gas Turbines (10/17/94)	Minor and Major (non- CTG source)	60 FR 43713 (08/23/95), for Rule 10/17/94.	Rule 250 meets RACT. It meets the ACT. It was SIP approved on 10/17/94. It is consistent with other Regional District rules.
Metal Coil, Container, and Closure	Existing Stationary Sources – Volume II:	Rule 223, Metal Container Coating (10/06/94)	Minor		Rule 223 (10/06/94) meets RACT. It meets the CTG. It was SIP approved on 01/10/95. It is consistent with other Regional District rules.
Semiconductor		Rule 244, Semiconductor Operations (02/09/95)	Minor		Rule 244 meets RACT. There is no available federal CTG guidance for this source category. The Rule was SIP approved on 07/25/96.

Table 1. Existing District Rules that have Been Determined to Meet RACT

Source Category	RACT Guidance Document Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Analysis Used to Determine that the Rule Meets RACT
Tanks	Storage of Petroleum Liquids in Fixed Roof Tanks (EP-450/2-77-036, 12/77);	Rule 212, Storage of Organic Liquids (06/19/97)	Minor	74 FR 27714 (06/11/09), for Rule 06/19/97.	Rule 212 (06/19/97) meets RACT. It meets all CTGs and ACTs. It was SIP approved on 06/11/09.
District Rules that	are Under Current EPA Review for SIP Ap	proval		•	
Architectural Coatings	National VOC Emission Standards for Architectural Coatings (40 CFR 59 Subpart D, 63 FR 176: 48848, 09/98)	Rule 218, Architectural Coatings (10/14/10)	Minor	(07/18/96), for	Rule 218 (10/14/10) meets RACT. It meets Federal VOCs requirements. It was recently updated to meet California's Suggested Control Measure (2007). It was submitted to EPA (04/05/11) for SIP approval.
Automotive Refinishing	Reduction of Volatile Organic Compound Emissions from Automobile Refinishing (EPA-450/3-88-009, 10/88); National VOC Emission Standards for Automobile Refinish Coatings (40 CFR 59 Subpart B, 09/98)	Rule 234, Automotive Refinishing (10/14/10)	Minor		Rule 234 (10/14/10) meets RACT. It meets Federal requirements for VOCs. It was recently updated to meet California's Suggested Control Measure (2005). It was submitted to EPA (04/05/11) for SIP approval.
Boilers, Water Heaters ≥ 5 million Btu/hr	NOx Emissions from Process Heaters (EPA-453/R-93-034, 09/93); NOx Emissions from Utility Boilers (EPA-453/R- 94-023, 03/94); NOx Emissions from Industrial / Commercial / Institutional Boilers (EPA-453/R-94-022, 03/94)	231, Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (10/09/97)	Minor		Rule 231 (10/09/97) meets RACT. It meets the ACT. It was submitted to EPA (03/17/09) for SIP approval.

Table 1. Existing District Rules that have Been Determined to Meet RACT

,	RACT Guidance Document Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Analysis Used to Determine that the Rule Meets RACT
Coatings	Control Technique Guidelines for Flat Wood Paneling Coatings (EPA-453/R-06- 004, 09/06)	Rule 238, Factory Coating of Flat Wood Paneling (10/14/10)	Minor		Rule 238 (10/14/10) meets RACT. It was recently amended to meet the CTG. It was submitted to EPA (04/05/11) for SIP approval.
	Design Criteria for Stage I Vapor Control Systems – Gasoline Service Stations (11/75); Control of Volatile Organic Compound Equipment Leaks from Natural Gas/Gasoline Processing Plants (EPA-450/3-83-007, 12/83); Technical Guidance – Stage II Vapor Recovery Systems for Control of Vehicle Refueling Emissions at Gasoline Dispensing Facilities (EPA-450/3-91-022a, 11/91); Control of VOC Leaks from Gasoline Tank Trucks and Vapor Collection Systems (EPA-450/2-78-051, 12/78)	Rule 214, Transfer of Gasoline into Vehicle Fuel Tanks (04/09/09)	Minor	\ //	Rule 214 (04/09/09) meets RACT. It meets the CTG. Rule 214 meets all current California requirements for this source category including recent rules for Phase II Enhanced Vapor Recovery system. It was submitted to EPA (09/15/09) for SIP approval.
	Control Technique Guidelines for Miscellaneous Metal and Plastic Parts Coatings (EPA 453/R-08-003, 09/08); NESHAP Subpart PPPP, Plastic Parts (4/19/04)	245, Surface Coating of Metal Parts and Products (08/20/09)	Minor		Rule 245 (08/20/09) meets RACT. It was recently amended to meet the CTG. It was submitted to EPA (01/10/10) for SIP approval.

Table 1. Existing District Rules that have Been Determined to Meet RACT

Source Category	RACT Guidance Document Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Analysis Used to Determine that the Rule Meets RACT
Municipal Solid Waste Landfill	New Source Performance Standards and Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills (40 CFR 60 Subpart Cc, 03/96); New Source Performance Standards for Municipal Solid Waste Landfills (40 CFR 60 Subpart WWW, 03/96); NESHAP Subpart AAAA, Municipal Solid Waste Landfill (01/03); CARB, Methane Emissions from Municipal Solid Waste Landfills (CCR Title 17, Subchapter 10, Article 4, Subarticle 6, Section 95460, 03/09)	Rule 237, Municipal Landfills (10/09/03)	Minor		Rule 237 (10/09/03) meets RACT. It meets Federal requirements for NOx and VOCs. It was submitted to EPA (05/17/10) for SIP approval.
Polyester Resin Operations	CARB Determination of RACT and Best Available Retrofit Control Technology (BARCT) for Polyester Resin Operations document (01/08/91); Control of VOC Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment (EPA-450/3-83-006, 03/84); Control of VOC Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins (EPA-450/3-83-008, 11/83); NESHAP Subpart FFFF, Misc. Organic Chemical Production and Processes (MON) (11/10/03)	Rule 243, Polyester Resin Operations (04/10/03)	Minor		Rule 243 (04/10/03) meets RACT. It meets the CTG. It meets CARB's RACT/BARCT guidance (01/08/91). It was submitted to EPA (12/07/10) for SIP approval.

Table 1. Existing District Rules that have Been Determined to Meet RACT

Source Category	Technique Guidelines (CTG),		PCAPCD Sources		Analysis Used to Determine that the Rule Meets RACT
Reciprocating Internal Combustion Engines	Subpart ZZZZ , Reciprocating Internal	Stationary Internal Combustion	Minor		Rule 242 (04/10/03) meets RACT. It meets Federal requirements for NOx. It was submitted to EPA (12/07/10) for SIP approval.
Wood Furniture Coatings	Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations (EPA-453/R-96- 007, 04/96); NESHAP Subpart JJ, Wood Furniture (12/7/95)	Products Coating	Minor	61 FR 18962 (4/30/96), for Rule 02/09/95.	Rule 236 (10/14/10) meets RACT. It was recently amended to meet the CTG. It was submitted to EPA (04/05/11) for SIP approval.

Table 2. Existing District Rules That Require Amendments to Meet RACT

	Technique Guidelines (CTG), Alternative		PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
	Control Technique Guidelines for Miscellaneous Industrial Adhesives (EPA 453/R-08-005, 09/08); NESHAP Subpart FFFF, Misc. Organic Chemical Production and Processes (MON) (11/10/03)	Rule 235, Adhesives (04/08/04)	Minor	61 FR 37390 (07/18/96), for Rule 06/08/95.	Rule 235 (04/08/04) does not meet RACT. It needs amendment based on the 2008 CTG and EPA comments letter (01/29/10), which identifies specific changes to meet the 2008 CTG.
Boilers, Biomass	New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60 Subpart Db, 06/03)	Rule 233, Biomass Boilers (12/10/09)	Major	61 FR 18959 (04/30/96), for Rule 10/06/94.	Rule 233 (12/10/09) may not meet RACT. The District is in the process of evaluating RACT based on EPA comments (05/17/10) to our SIP submittal.
Cutback Asphalt	Control of VOC from Use of Cutback Asphalt (EPA-450/2-77-037, 12/77)	Rule 217, Cutback and Emulsified Asphalt Paving Materials (10/19/93)	Minor	62 FR 23365 (04/30/97), for Rule 10/19/93.	Rule 217 (10/19/93) does not meet RACT. It needs amendment based on EPA comments letter (10/10/06).
	Control of VOC Emissions from Large Petroleum Dry Cleaners (EPA-450/3-82-009, 09/82). New Source Performance Standards for Petroleum Dry Cleaners (40 CFR 60 Subpart JJJ, 10/00)	Rule 227, Petroleum Dry Cleaning Operations (02/05/91)	Minor		Rule 227 (02/05/91) does not meet RACT. It needs amendment based on EPA comments (03/27/09), and the most recent federal requirements for VOCs.
Graphic Arts, Lithographic and Letterpress Printing	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VIII: Graphic Arts-Rotogravure and Flexography (EPA-450/2-78-033, 12/78); Control Technology Guidelines for Offset Lithographic Printing and Letterpress Printing (EPA-453/R-06-002, 09/06)	Rule 239, Graphic Arts Operations (04/08/04)	Minor	63 FR 63410 (11/13/98), for Rule 02/13/97.	Rule 239 (04/08/04) does not meet RACT. It needs amendment based on the 2006 CTG and EPA comments (09/09/08) regarding SMAQMD Rule 450.

Table 2. Existing District Rules That Require Amendments to Meet RACT

Source Category			PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
Solvent Cleaning	Control Techniques Guidelines for Industrial Cleaning Solvents (EPA-450/2-77-0221977/11); Control Techniques Guidelines for Industrial Cleaning Solvents (EPA-453/R-06-001, 09/06); Alternative Control Techniques Document – Industrial Cleaning Solvents (EPA-453/R-94-015 1994/02); Halogenated Solvent Cleaners (EPA-450/3-89-030, 89/08); NESHAP Subpart T, Degreasing Organic Cleaners (12/2/94)	Organic Solvent Cleaning and Degreasing (12/11/03); 240, Surface Preparation and		FR 24406 (05/05/10), for Rule 05/15/08.	Rule 216 (12/11/03) and Rule 240 (12/11/03) may meet RACT. The District will evaluate possible rule amendments based on CARB comments (07/27/08), the 2006 CTG, the EPA's TSD (01/21/10) and e-mail (04/07/10), and a Regional Cleaning Solvent VOC content limit of 25 g/L as applied.

Table 3. New Rule to be Adopted

Source	RACT Guidance Document Control	PCAPCD Rule (Date	PCAPCD	Most Recent SIP	Actions Required to Meet RACT
Category	Technique Guidelines (CTG), Alternative	Last Amended)	Sources	Approval	
	Control Technology (ACT), and Others				
Plastic Parts	Control Technique Guidelines for		Minor		District to develop new Rule 249
Coatings	Miscellaneous Metal and Plastic Parts				based on 2008 CTG.
	Coatings (EPA 453/R-08-003, 09/08)				

Table 4. CTG/ACT Source Categories for Which a Negative Declaration is Required

Source Category	RACT Guidance Document Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
Source Categories	with CTGs				
Aerospace Coatings	Control of Volatile Organic Compound (VOC) Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations CTG (EPA-453/R-97-004, 12/97); National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart GG, Aerospace Manufacturing and Rework Facilities (03/27/98)		No Major or Minor that Require District Permit		Negative declaration to be adopted since the CTG applicability threshold is 25 tons/year for sources in moderate, serious, or sever non-attainment areas, and the potential VOC emissions from existing sources in the District are less than 25 tons/year.
Automobile and Light-duty Truck Assembly Coatings	Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings (EPA 453/R-08-006, 09/08)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Fiberglass Boat Manufacturing	Control Technique Guidelines for Fiberglass Boat Manufacturing Materials (EPA 453/R-08- 004, 09/08)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Flexible Package Printing	Control Technique Guidelines for Flexible Package Printing (EPA-453/R-06-003, 09/06)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Large Appliances Surface Coatings	Control Technique Guidelines for Large Appliance Coatings (EPA 453/R-07-004, 09/07); NEHSAP Subpart NNNN, Large Appliances (7/23/02)		None		Negative declaration to be adopted. There are no sources for this category in the District.
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, 12/77)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Metal Furniture Coatings	Control Techniques Guidelines for Metal Furniture Coatings (EPA 453/R-07-005, 09/07);NESHAP Subpart RRRR, Metal Furniture (5/23/03)		None		Negative declaration to be adopted. There are no sources for this category in the District.

Table 4. CTG/ACT Source Categories for Which a Negative Declaration is Required

Source Category	RACT Guidance Document Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
Natural Gas / Gasoline Processing	Control of VOC Equipment Leaks from Natural Gas / Gasoline Processing Plants (EPA-450/2-83-007, 12/83)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Paper and Fabric	Control of Volatile Organic Emissions from Existing Stationary Sources – Volume II: Surface Coatings of Cans, Coils, Paper, Fabric, Automobiles, and Light-Duty Trucks (EPA-450/2-77-008, 05/77)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Paper, Film, and Foil Coatings	Control Techniques Guidelines for Paper, Film, and Foil Coatings (EPA-453/R-07-003, 09/07)	230, Plastic Products and Materials – Paper Treating Operations (06/28/94)	None	59 FR 64336 (12/14/1994), for Rule 06/28/94.	Rule 230 to be rescinded. The only source, Formica, is shutdown on 06/29/07. Negative declaration to be adopted.
Pharmaceutical Products	Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products (EPA-450/2-78-029, 12/78)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Refineries	Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds (EPA-450/2-77- 025, 10/77); Control of VOC Leaks from Petroleum Refinery Equipment (EPA-450/2-78- 036, 06/78)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Rubber Tire	Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires (EPA- 450/2-78-030, 12/78)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Ships/Marine Coating	Control Technique Guidelines for Shipbuilding and Ship Repair Operations (Surface Coating) (61 FR 44050, 08/27/96)); NESHAP Subpart II, Shipbuilding and Ship Repair (surface coating) (12/16/96)		None		Negative declaration to be adopted. There are no sources for this category in the District.

Table 4. CTG/ACT Source Categories for Which a Negative Declaration is Required

Source Category	RACT Guidance Document Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
Synthetic Organic Chemicals	Control of VOC Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry (EPA-450/3-84-015, 12/84); Control of VOC Emissions from Reactor Processes and Distillation Operations in SOCMI (EPA-450/4-91-031, 11/93)		None		Negative declaration to be adopted. There are no sources for this category in the District.
Source Categories	s with ACT and Other RACT Guidance (not C	ΓGs)		.	
Bakery Ovens	Alternative Control Technology Document – Bakery Ovens (EPA-453/R-92-017, 12/92)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Cement Kilns	NOx Emissions from Cement Manufacturing (EPA-453/R-94-004, 03/94)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Chemical Plants	Control Techniques for Fugitive VOC Emissions from Chemical Process Facilities (EPA-625/R-93-005, 03/94)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Ethylene Oxide	Alternative Control Technology Document – Ethylene Oxide Sterilization / Fumigation Operations (EPA-450/3-89-007, 03/89)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Glass Furnaces	NOx Emissions from Glass Manufacturing (EPA-453-R-94-037, 01/93)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Ink and Paint Manufacture	Control of VOC Emissions from Ink and Paint Manufacturing Processes (EPA-450/3-92-013, 04/92)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Iron and Steel	NOx Emissions from Iron and Steel Mills (EPA-453/R-94-065, 09/94)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Leather and Tanning	Air Emissions and Control Technology for Leather Tanning and Finishing Operations (EPA-453/R-93-025, 06/93)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.

Table 4. CTG/ACT Source Categories for Which a Negative Declaration is Required

Source Category	RACT Guidance Document Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet RACT
Nitric and Adipic Acid	NOx Emissions from Nitric and Adipic Acid Manufacturing (EPA-453/3-91-026, 12/91)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Pesticides	Control of VOC Emissions from the Application of Agricultural Pesticides (EPA- 453/R-92-011, 03/93)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Polymeric Foam Product Manufacturing	Control of VOC Emissions from Polystyrene Foam Manufacturing (EPA-450/3-90-020, 09/90)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.
Wastewater	Control of VOC Emissions from Industrial Wastewater (EPA-453/D-93-056, 09/92)		None		ACT or Other RACT Guidance. There are no sources for this category in the District.

Table 5. Existing District Rules that will be Rescinded

Source Category	RACT Guidance Document Control Technique Guidelines (CTG), Alternative Control Technology (ACT), and Others	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Rule to be Rescinded
Boilers, Biomass		232, Biomass Suspension Boilers (12/09/99)	Major (non- CTG source)		Rule 232 to be rescinded. The only source, SierraPine, has replaced the biomass boiler with a natural gas boiler in March 2011.
		241, Boilers at Plastic Laminate Manufacturing Facilities (04/08/99)	Major (non- CTG source)		Rule 241 to be rescinded. The only source, Formica, is shutdown (06/29/07).
Paper, Film, and Foil Coatings	Control Techniques Guidelines for Paper, Film, and Foil Coatings (EPA- 453/R-07-003, 09/07)	230, Plastic Products and Materials – Paper Treating Operations (06/28/94)	Major	59 FR 64336 (12/14/1994), for Rule 06/28/94.	Rule 230 to be rescinded. The only source, Formica, is shutdown (06/29/07).

Table 6. Every Feasible Measure (EFM)

Source Category	CARB Every Feasible Control Measure (EFM)	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet EFM
Adhesives	SMAQMD Rule 460 (11/30/00); SJUAPCD Rule 4653 (09/16/10); BAAQMD Reg. 8, Rule 51 (12/02/09); SCAQMD Rule 1168 (01/07/05); SDCAPCD Rule 67.21 (05/14/08); YSAPCD Rule R2-33 (05/14/08); CARB- Reasonably Available Control Technology (RACT) (1998)	Rule 235, Adhesives (04/08/04)	Minor	61 FR 37390 (07/18/96), for Rule 06/08/95.	Rule 235 emission reduction measures will be equal to equivalent measures in the regional districts rules.
Aerospace Coatings	SCAQMD Rule 1124 (12/13/96); SDCAPCD Rule 67.9 0 (04/30/97)		No Major or Minor		There are no sources subject to this source category in the District.
Architectural Coatings	CARB Suggested Control Measure (SCM) (2007); SCAQMD Rule 1113 (07/13/07)	Rule 218, Architectural Coatings (10/14/10)	Minor	61 FR 37390 (7/18/96), for Rule 02/09/95.	Rule 218 considers the State emission reduction measures equal to the 2007 CARB SCM.
Automotive Refinishing	CARB Suggested Control Measure (SCM) (10/05); SCAQMD Rule 1151 (12/02/05)	Rule 234, Automotive Refinishing (10/14/10)	Minor		Rule 234 considers the State emission reduction measures equal to the 2005 CARB SCM.
Bakery Ovens	SMAQMD Rule 458 (09/05/96); SJUAPCD Rule 4693 (05/16/02); BAAQMD Reg. 8, Rule 42 (06/01/94); SCAQMD Rule 1153 (01/13/95); SDCAPCD Rule 67.24 (05/15/96)		None		There are no sources subject to this source category in the District.
Fugitive Emissions from Chemical Plants	BAAQMD Reg. 8, Rules 22 (06/01/94), 28 (06/15/94), 18 (01/07/98)		None		There are no sources subject to this source category in the District.
Fugitive Emissions from Oil and Gas Production	RACT Determination of Fugitive Emissions of Fugitive Emissions of VOCs from Oil and Gas Production and Processing; Facilities, Refineries, Chemical Plants, and Pipeline Transfer Stations (12/08/93)		None		There are no sources subject to this source category in the District.

Table 6. Every Feasible Measure (EFM)

Source Category	CARB Every Feasible Control Measure (EFM)	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet EFM
Fugitive Emissions from Petroleum Refineries	BAAQMD Reg. 8, Rules 28 (06/15/94), 18 (01/07/98)		None		There are no sources subject to this source category in the District.
Gasoline Terminals and Bulk Plants	SMAQMD Rules 446 (11/16/93), 447 (04/02/98); SJUAPCD Rules 4621 (12/20/07), 4623 (05/19/05); BAAQMD Reg. 8, Rules 33 (4/15/09), 39 (04/15/09), 5 (10/12/06); SCAQMD Rules 462 (05/14/99), 463 (05/06/08); SDCAPCD Rules 61.1 (07/26/00), 61.2 (07/26/00), 61.3 (10/16/03), 61.3.1 (03/01/06), 61.8 (01/13/87).1, 61.4.1 (03/26/08); YSAPCD Rules R2-13 (05/25/94), R2-21 (09/14/05)	Rule 215, Transfer of Gasoline into Tank Trucks, Trailers, and Railroad Tank Cars at Loading Facilities (06/19/97)	Minor	76 FR 5277 (01/31/11), for Rule 06/19/97.	Rule 215 emission reduction measures are equal to equivalent measures in the regional districts rules.
	SMAQMD Rule 450 (10/23/08); SJUAPCD Rule 4607 (12/08/08); BAAQMD Reg. 8, Rule 20 (11/19/08); SCAQMD Rules 1130 (10/8/99); SDCAPCD Rule 67.16 (05/15/96)	239, Graphic Arts Operations (04/08/04)	Minor	63 FR 63410 (11/13/98), for Rule 02/13/97.	Rule 239 emission reduction measures will be revised to meet equivalent measures in the regional districts rules.
	SMAQMD Rule 411 (03/25/10); SJUAPCD Rules 4305 (08/21/03), 4306 (10/16/08); BAAQMD Reg. 9, Rule 7 (07/30/08); SDCAPCD Rules 69 (12/12/95),69.2 (09/27/94); YSAPCD Rule R2-27 (08/14/96); CARB - RACT and Best Available Retrofit Control Technology (BARCT) for Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (07/18/91)	231, Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (10/09/97)	Minor		Rule 231 emission reduction measures are equal to equivalent measures in the regional districts rules.

Table 6. Every Feasible Measure (EFM)

	CARB Every Feasible Control Measure (EFM)	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet EFM
Large Water Heaters and Small Boilers < 2 million Btu/hr	SCAQMD Rule 1146.2 (05/05/06)	264, Natural Gas Fired Water Heaters (06/19/97)	Minor		Rule 264 applies to natural gas water heater < 750,000 Btu/hr and is consistent with the regional districts rules. The District will develop new Rule 247 for all new boilers and water heaters within the heat input range of 75,000 to 1 million Btu/hr SIP commitment by 2015 Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan.
_	SCAQMD Rule 1106 (01/13/95); NESHAP 60 FR 64330 (12/15/95)		None		There are no sources subject to this source category in the District.
Products (Non- Architectural)	SMAQMD Rule 451 (09/25/2008); SJUAPCD Rule 4603 (09/17/09); BAAQMD Reg. 8, Rule 19 (10/16/02); SCAQMD Rule 1107 (01/06/06); SDCAPCD Rule 67.3 (04/9/03); YSAPCD Rule R2-25 (05/14/08)	245, Surface Coating of Metal Parts and Products (08/20/09)	Minor		Rule 245 is consistent with the regional districts rules. It was recently amended to meet the Control Technique Guidelines (CTG).
Pleasure Craft Coating Operations	SCAQMD Rule 1106.1 (02/12/99)		None		There are no sources subject to this source category in the District.
Polyester Resin Operations	SMAQMD Rule 465 (09/25/08); SJUAPCD Rule 4684 (09/17/09); BAAQMD Reg. 8, Rule 50 (12/2/09); SCAQMD Rule 1162 (07/08/05); SDCAPCD Rule 67.12 (05/15/96); YSAPCD Rule R2-30 (05/14/08)	243, Polyester Resin Operations (04/10/03)	Minor		Rule 243 considers the State emission reduction measures equal to the 2007 CARB's RACT/BARCT.
Polymeric Foam Product Manufacturing	SJUAPCD Rule 4682 (09/20/07); SDCAPCD (05/15/96); SCAQMD Rule 1175 (09/07/07)		None		There are no sources subject to this source category in the District.

Table 6. Every Feasible Measure (EFM)

Source Category	CARB Every Feasible Control Measure (EFM)	PCAPCD Rule (Date Last Amended)	PCAPCD Sources	Most Recent SIP Approval	Actions Required to Meet EFM
Kilns	SCAQMD Rule1112 (06/06/86)		None		There are no sources subject to this source category in the District.
Refinery Boilers	SCAQMD 1109 (08/05/88) BAAQMD Reg. 9 Rule10 (01/05/94)		None		There are no sources subject to this source category in the District.
Restaurants, Chain Driven Charbroilers	SJUAPCD Rule 4692 (9/17/09); SCAQMD Rule1138 (11/14/97)		Minor		There are no sources subject to this source category in the District.
	SMAQMD Rule 414 (08/23/07); SJUAPCD Rules 4307(10/16/08); 4308 (12/17/09)		Minor		There is no applicable District rule to this source category.
Solvent Cleaning	SMAQMD Rule 466 (09/25/08); SJUAPCD Rules 4663 (09/20/07), 4461 (09/20/07); BAAQMD Reg.8, Rule 16 (10/16/02); SCAQMD Rules 1122 (05/1/09), 1171 (05/1/09); SDCAPCD Rule 67.6.1 (05/23/07)	216, Organic Solvent Cleaning and Degreasing (12/11/03); 240, Surface Preparation and Cleanup (12/11/03)	Minor	75 FR 24406 (05/05/10), for Rule 05/15/08.	Rule 216 emission reduction measures will be equal to equivalent measures in the regional districts rules.
Surface Coating of Plastic Parts and Products	BAAQMD Reg. 8, Rule 31 (10/16/02); SCAQMD Rule 1145 (12/04/09)		Minor	Minor	District to develop new Rule 249 based on 2008 the CTG.
Wood Furniture Coatings	BAAQMD Reg. 8, Rule 32 (08/5/09); SCAQMD Rule 1136 (06/14/96)	236, Wood Products Coating Operations (10/14/10)	Minor	61 FR 18962 (4/30/96), for Rule 02/09/95.	Rule 243 is consistent with the regional districts rules. It was recently amended to meet the CTG.

Table 7. Adoption Schedule for RACT SIP and Ozone Plan Rule Revisions and New Rules

District Rule #	District Rule Title	Requirement	Action	Tentative Scheduled Adoption Date
233	Biomass Boilers	RACT SIP	Rule revision	2012
235	Adhesives	RACT SIP	Rule revision	2012
227	Petroleum Dry Cleaning	RACT SIP	Rule revision	2012
239	Graphic Arts Operations	RACT SIP	Rule revision	2012
248	Asphalt Concrete	Regional Ozone Plan	New rule	2013
249	Plastic Parts Coating	RACT SIP	New rule	2013
216	Organic Solvent Cleaning and Degreasing	RACT SIP	Rule revision	2013
240	Surface Preparation and Cleanup	RACT SIP	Rule revision	2013
217	Cutback Asphalt	RACT SIP	Rule revision	2013
247	Large Water Heaters and Small Boilers	Regional Ozone Plan	New rule	2015

Table 8. District Rules Requiring Administrative Changes and Other Changes Not Related to the RACT SIP Analysis

Rule Number	Title	SIP	SIP Status	Last Update	Amendment Recommended	Tentative Date of Proposed Action
110111501						Tropodou Admon
Rules Red	commended for Administrative Amendment					
203	Exceptions To Rule 202	Υ	Approved	10/19/1993	Consistency	TBD
205	Nuisance	N	Not Applicable	05/24/77	Clarification	TBD
209	Fossil Fuel-Steam Facility	Υ	Approved	10/19/93	Consistency	TBD
212	Storage of Organic Liquids	Υ	Approved	6/19/1997	Clarification, Formatting,	TBD
213	Gasoline Transfer into Stationary Storage Containers	Y	Approved	10/19/1993	Minor Corrections	TBD
223	Can Coating	Υ	Approved	10/6/1994	Consistency	TBD
225	Wood Burning Appliances	N	Not Applicable	12/13/2007	Clarification	2011
229	Fiberboard Manufacturing	Υ	Approved	6/28/1994	Consistency, Formatting	TBD
231	Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters	Y	Pending	10/9/1997	Formatting	TBD
244	Semiconductor Operations	Υ	Approved	2/9/1995	Consistency	TBD
246	Natural Gas-Fired Water Heaters	Υ	Pending	6/19/1997	Formatting	TBD
250	Stationary Gas Turbines	Υ	Approved	10/17/1994	Formatting	TBD
402	Authority to Inspect	N	Not Applicable	5/24/1977	Include Authority to Take Photos	TBD
404	Upset Conditions, Breakdown or Scheduled Maintenance	N	Not Applicable	6/19/1979	Rename Upset Breakdown	TBD
409	Public Records	Y	Approved	5/24/1977	Include Authority to Take Photos	TBD
410	Recordkeeping for Volatile Organic Compound Emissions	Υ	Approved	11/3/1994	Consistency	TBD
412	Agricultural Engine Registration	N	Not Applicable	8/14/2008	Address CARB Comments, Add Low-Use Exception	2011
503	Emission Statement	Υ	Pending	8/12/2010	Formatting	TBD
506	Biomass Emission Reduction Credits and Banking	Y	Not Submitted	8/8/1996	Amend or Resind Due to Adoption of Rule 516	2012
507	Federal Operating Permit Program	N	Not Applicable	4/8/2004	Include Greenhouse Gases	TBD
510	Violation and Determination of Compliance - Title V	N	Not Applicable	2/9/1995	Formatting	TBD
511	Potential to Emit	N	Withdrawn	6/8/1995	Formatting	TBD

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Table 8. District Rules Requiring Administrative Changes and Other Changes Not Related to the RACT SIP Analysis

Rule Number	Title	SIP	SIP Status	Last Update	Amendment Recommended	Tentative Date of Proposed Action
512	Request for Synthetic Minor Status	N	Approved	6/8/1995	Formatting	TBD
514	Federal Major Modifications	N	Not Applicable	10/12/2006	Formatting	TBD
516	Rice Straw Burning Emission Reduction Credits	Υ	Pending	2/19/2009	Clarification	TBD
601	Permit Fees	N	Not Applicable	12/13/2007	Include New Fee Types	TBD
604	Source Test Observation and Report Evaluation	N	Approved Not Applicable	8/8/1996	Add Hourly Rate	2012
610	Air Toxics "Hot Spots" Fees	N	Not Applicable	7/16/1998	Formatting, Include New Fee Types	2012
803	Penalties	N	Not Applicable	2/14/2002	Formatting	TBD
805	Notice to Comply	N	Not Applicable	8/12/1999	Rescind	2012
902	Airborne Chromium Control Measure - Emissions of Hexavalent Chromium From Chrome Plating and Anodizing Operations	N	Not Applicable	6/8/1995	Rescind	2012
903	Ethylene Oxide Airborne Toxic Control Measure for Sterilizers and Aerators	N	Not Applicable	2/5/1991	Rescind	2012
904	Airborne Toxic Control Measure - Hexavalent Chromium Emissions from Cooling Towers	N	Not Applicable	5/7/1991	Rescind	2012
905	Airborne Toxic Control Measure Asbestos-Containing Serpentine Rock in Surfacing Applications	N	Not Applicable	10/19/1993	Rescind	2012
906	Airborne Toxic Control Measure Medical Waste Incinerators	N	Not Applicable	2/4/1992	Rescind	2012
Rules Not	│ t Related to RACT SIP With Amendment Requiring SI	I P Revie	<u> </u> ew			
206	Incinerator Burning/Pathological Incineration	Υ	Withdrawn	10/9/2008	Amend	2013
207	Particulate Matter	Υ	Withdrawn	10/19/1993	Amend	2013
230	Plastic Products and Materials - Paper Treating Operations	Υ	Approved	6/28/1994	Rescind	2012
232	Biomass Suspension Boilers	Υ	Not Approved	12/9/1999	Rescind	2012
237	Municipal Landfills	Υ	Pending	10/9/2003	Amend	2012

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Table 8. District Rules Requiring Administrative Changes and Other Changes Not Related to the RACT SIP Analysis

Rule Number	Title	SIP	SIP Status	Last Update	Amendment Recommended	Tentative Date of Proposed Action
241	Boilers at Plastic Laminate Manufacturing Facilities	Υ	Not Submitted	4/8/1999	Rescind	2012
245	Surface Coating of Metal Parts and Products	Υ	Approved	8/20/2009	Amend	2013
502	New Source Review	Y	Limited Approval	8/12/2010	Amend	2012

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