PLACER COUNTY AIR POLLUTION CONTROL DISTRICT

2006 RACT SIP UPDATE ANALYSIS STAFF REPORT

AN ANALYSIS OF REASONABLY AVAILABLE CONTROL TECHNOLOGY TO UPDATE THE 8-HOUR OZONE STATE IMPLEMENTATION PLAN FOR PLACER COUNTY

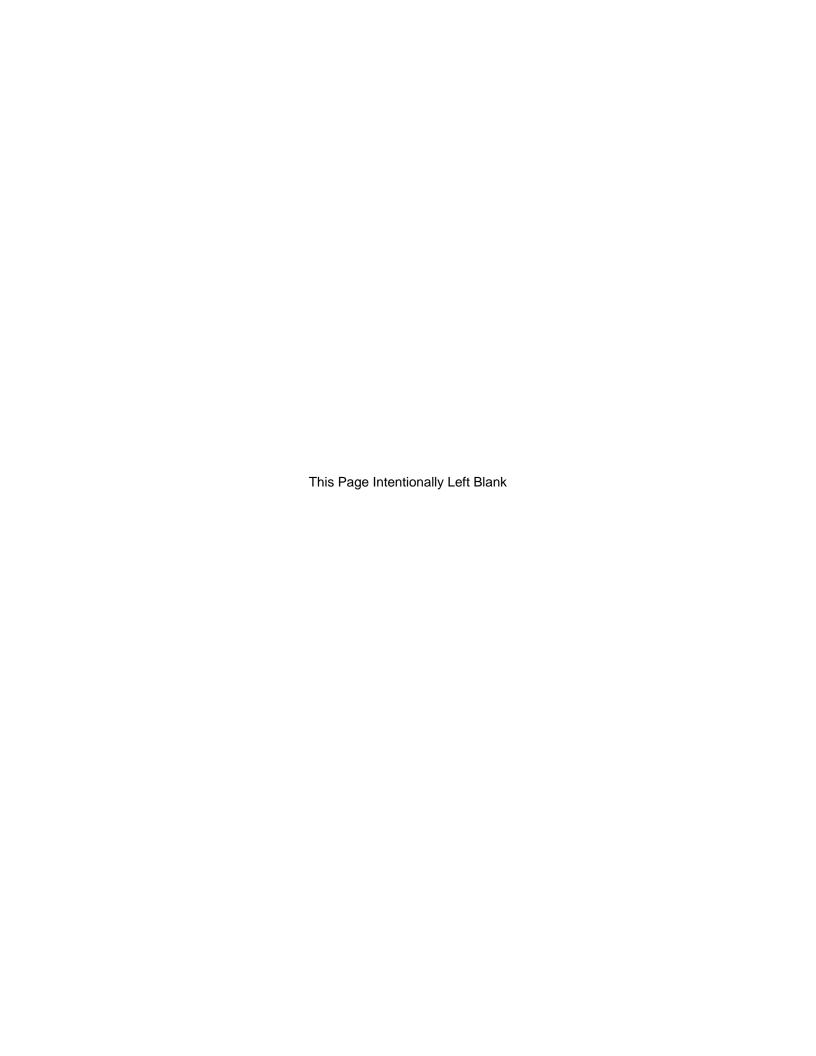


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INTRODUCTION

Placer County is located in northern California, bordering Sacramento County to the west and the State of Nevada on the east. Air quality attainment planning is under the jurisdiction of the Placer County Air Pollution Control District (District). 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 temperatures usually in the 90s. 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 SVAB and MCAB are included in the Sacramento Federal Ozone Non-Attainment Area (SFONA), which has been designated as "serious" non-attainment for the 8-hour ozone National Ambient Air Quality Standard (NAAQS). Before the U.S. Environmental Protection Agency (U.S. EPA) posted new 8-hour ozone designations and non-attainment classifications in June 2004, the SFONA was a "severe" non-attainment area for the 1-hour ozone NAAQS. Although the U.S. EPA revoked the 1-hour ozone NAAQS, the SFONA still remains subject to control measure commitments that applied under the 1-hour ozone NAAQS. Therefore, the District is responsible for implementing emission standards and other requirements mandated by the Federal Clean Air Act.

REASON FOR THIS ANALYSIS

Sections 182(b)(2) and 182(f) of the Federal Clean Air Act require ozone non-attainment areas to implement Reasonably Available Control Technology (RACT) for sources that are subject to Control Techniques Guideline (CTG) documents issued by U.S. EPA and for "Major Sources" of Volatile Organic Compounds (VOCs) and Oxides of Nitrogen (NOx), which are ozone precursors. RACT requirements are included in the Clean Air Act to assure that significant source categories at Major Sources are controlled to a "reasonable" extent, but not necessarily to Best Available Control Technology (BACT) or Maximum Achievable Control Technology" (MACT) levels which are expected of new sources.

U.S. EPA defines RACT as the lowest emission limitation that a particular source is capable of meeting by the application of technology (i.e., devices, systems, process modification, or other apparatus or techniques that reduce air pollution) that is reasonably available considering technological and economic feasibility.

According to the U.S. EPA's *Final Rule to Implement the 8-Hour Ozone NAAQS* (70 FR 71612, November 29, 2005) areas classified as moderate non-attainment or higher must submit a demonstration that their current rules fulfill 8-hour ozone RACT for all CTG categories and all Major, non-CTG Sources as a revision to their State Implementation Plan (SIP). States can demonstrate that RACT is being met with either a new RACT determination or a certification that previously required RACT controls represent RACT for 8-hour ozone. Areas may rely on previous analyses written for 1-hour ozone plans and U.S. EPA guidance documents. The RACT SIP submittal is in addition to the area's 8-hour Ozone Attainment Demonstration Plan, which will also be a SIP submittal. The RACT SIP analysis must be submitted to U.S. EPA by September 15, 2006. The last RACT SIP update by the District was completed in 1997.

ACTION REQUESTED BY U.S. EPA

On March 9, 2006 and April 4, 2006, Andrew Steckel, U.S. EPA Office Rulemaking Chief, sent request letters to the California Air Resources Board (CARB). The letters concern District requirements and outlined a possible RACT SIP submittal strategy to determine whether RACT requirements have been met. District activities performed as a part of this analysis are as follows:

<u>Part 1</u> RACT Standards - Identify all District rules subject to the U.S. EPA Control Techniques Guidelines (CTG) source categories within the District and determine if they meet RACT standards.

<u>Part 2</u> Negative Declarations - Identify all CTG categories for which there are no facilities in the District, and submit Negative Declarations stating that there are no such facilities.

<u>Part 3</u> SIP Approval Status – Identify all District rules subject to the U.S. EPA CTG source categories within the District and determine if they meet RACT standards.

<u>Part 4</u> Summary and Conclusions - Summarize the above processes that the District used to: (1) determine that the District regulations fulfill RACT, (2) determine Negative Declarations needed for certain CTG categories, and (3) determine which District rules need to be submitted to U.S. EPA as revision to the SIP.

The District was requested to prepare a complete RACT SIP update analysis, covering Major Sources, non-Major Sources, and non-CTG Major Sources. U.S. EPA requires the District's submittal by September 15, 2006. In addition, the District is required to implement an 8-hour Ozone Demonstration Plan no later than the beginning of the first ozone season or portion thereof that occurs 30 months after the above submittal date. This would be March 15, 2009. Since Placer County has a full year ozone season, the required implementation date for the District will be January 1, 2009. Note that the implementation date for any source operating under a Title V permit, pursuant to 40 CFR Part 70, would be governed by the requirements of that permit. This staff report relates to the September 15, 2006 submittal.

<u>ANALYSIS</u>

District Planning History

To improve the air quality in Placer County and move the region towards attainment of the NAAQS, the District has prepared and adopted several air quality attainment plans since 1991. The following table summarizes the District's attainment plans. The District has also adopted over 100 new rules and amendments to meet the commitments in these attainment plans. The air quality in Placer County has greatly improved over the past several years as the District has adopted air quality plans and regulations. In a continuation of the District's strategy for achieving the NAAQS, the District is working with other air districts in SFONA to submit an 8-hour ozone attainment demonstration plan to U.S. EPA by June 15, 2007, as specified by federal requirements.

The planning history is provided to show that District rules and regulations have been continually under review and have been updated on an ongoing basis since 1992 to incorporate new regulatory measures for emission sources or to amend existing rules to increase the stringency of the control measures, in keeping with technology improvements. These reviews and updates have been mandated by State and Federal air quality planning requirements. Since the previous RACT SIP analysis was completed in 1997, a number of rules were adopted or updated.

District Ozone Planning History

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 8-Hour Ozone Rate-of-Progress Plan	February 2006

^{*} A regional progress report that does not require Board adoption

Part 1 – <u>RACT Standards: Identify all District rules subject to the U.S. EPA CTG source</u> categories within the District and determine if they meet RACT standards.

This District analysis compared the current Prohibitory Rules (Regulation 2 in the District Rule Book) to current U.S. EPA guidance standards for emission control measure. The purpose of this work was to: (1) determine if the District had an adopted rule for the source category, (2) determine if the rule's control measures satisfied the requirements of the U.S. EPA's control measure standard, and (3) determine if a new rule will need to be adopted for existing emission sources. The standards compared were Control Techniques Guidelines (CTG) and Alternate Control Techniques (ACT) Guidance. CARB's All Feasible Measures (AFM) have also been included by Staff, since a number of the rule categories do not have CTGs and or ACTs. The ultimate purpose of this study is the determination by the District of whether the District has existing adopted rules that meet or exceed the standards in the current CTGs, ACTs, and AFMs.

To determine if District rules fulfill RACT requirements, Staff used the following guidelines:

- District rules that have been SIP-approved by U.S. EPA are considered to meet RACT requirements because U.S. EPA evaluated the rules to determine if they fulfill RACT established by CTGs, (ACTs) and U.S. EPA guidelines and policies. Therefore, any EPA SIP-approved District rules are said to have met RACT requirements.
- As a non-attainment area for the California ozone standard, the District is required by California Health and Safety Code (CH&SC) Sections 40914(a)(2) and 40920.6(a) to implement "All Feasible Control Measures" (AFCM) and "Best Available Retrofit Control Technology" (BARCT). In general, AFCM and BARCT requirements are more stringent than those previously established by CTGs and ACTs. Therefore, District rules that implemented AFCM and BARCT are said to fulfill RACT requirements.
- All CTG emission source categories were compared against existing adopted District rules and a finding was made regarding whether the adopted rule met or exceeded the applicable CTG RACT requirements or AFM requirements. All ACTs were evaluated to

determine whether Major Sources exist in the source category and if so, whether or not a District rule satisfying ACT guidelines has been adopted.

Table A, provided as an Appendix to this report, lists all U.S. EPA source categories requested, both Major and non-Major, and the corresponding CTG, ACT, and AFM with details of each rule or category. For each listed rule, Table A shows the Staff's determination if that rule meets current RACT requirements. All the adopted rules have been found to satisfactorily meet RACT requirements.

Table A shows that there are rule categories listed in the April 4, 2006 U.S. EPA letter for which no sources currently exist in the District. The absence of sources of these categories was determined by Staff, based on a study of the District permit base, classified phone listings, public notices, new business license requests and personal knowledge (See Part 2, below which discusses Negative Declarations) Staff also noted that the District has one new non-Major Source in a CTG category (Metal Parts and Products) that has no rule at this time. The District RACT SIP submittal process will include the requirement that an appropriate rule be written, adopted and approved subsequent to this RACT SIP study, but no later than the Placer County RACT implementation date of January 1, 2009.

Table A provides an overview of the relationship between source categories, U.S. EPA CTGS and ATCs, CARB AFMs, existing District sources, District Title V sources, and adopted District Rules and amendment, and Applicable SIP Approval dates. Individual findings from Table A are grouped topically and shown in Tables "B" through "D".

For Table A, see the Appendix to this report.

Major Sources:

The following Table B lists the Major Sources that are currently in the District.

	Table B - Major Sources - Placer Air Pollution and Control District										
Source	Source Category		Source Category Pollutant Rule No. Rule Title		Rule Title	Location / Comments					
SierraPine	Fiberboard Manufacturing	VOC	229	Fiberboard Manufacturing	Rocklin (Source was Major in						
Ltd. (Title V)	Boilers, Steam Generators and Process Heaters	NOx	232	Biomass Suspension Boilers	VOC, before recent installation of new controls.)						
Formica Corp. (Title	Paper and Fabrics	VOC	230	Plastic Products and Materials - Paper Treating Operations	Rocklin (Source plans to close						
V)	Boilers, Steam Generators and Process Heaters	NO _X	241	Boilers at Plastic Laminating Mfg. Facilities	permanently in near future)						
Sierra Pacific Industries (Title V)	Pacific Bollers, Steam Generators and Process Heaters		233	Biomass Boilers	Lincoln						
Rio Bravo (Title V)	Boilers, Steam Generators and Process Heaters	NO _X	233	Biomass Boilers	Lincoln						

	Table B - Major Sources - Placer Air Pollution and Control District											
Source	Source Category	Pollutant	Rule No.	Rule Title	Location / Comments							
Pacific MDF Products (Pending Title V)	Factory Coating of Flatwood Paneling	VOC	238	Factory Coating of Flatwood Paneling	Rocklin							
Pabco dba Gladding MacBean (Pending Title V)	Surface Coating	VOC	240	Surface Preparation and Cleanup	Lincoln							

All Major Stationary Sources, including Major non-CTG Sources have adopted District rules that satisfy RACT requirements.

Part 2 - Negative Declarations: Identify all CTG categories for which there are no facilities in the District, and submit Negative Declarations stating that there are no such facilities.

Background

Due to the designation of portions of Placer County as "moderate" or above non-attainment for ozone, Sections 182(b)(2) and 182(f) of the Federal CAA require the District to submit a revision to the State Implementation Plan (SIP) to implement RACT for each category of Volatile Organic Compound (VOC) or Nitrogen Oxide (NOx) sources covered by a CTG document and for any Major Stationary Source not covered by a CTG document. The Sacramento Valley Air Basin and the Mountain Counties Air Basin portions of the District are part of the Sacramento Federal Ozone Non-Attainment Area (SFONA) which is designated as "severe" non-attainment for ozone.

RACT requires that all non-attainment areas classified as "moderate" or above have RACT in place for source categories covered by a Control Techniques Guideline (CTG) document and for Major Sources that are not subject to a CTG (i.e. a "Major non-CTG Source"). A "Major Source" of VOCs or NOx in Placer County is defined as an emission source having a potential to emit of 25 tons of the pollutant per year. The Air District must adopt the control measures for a source category if it has a source of emissions located within the non-attainment area that is subject to a CTG. Alternatively, if the finding is made that there are no existing sources that emit the designated pollutants in its area subject to a RACT requirement, the District may make a negative declaration to this effect and consequently the requirement to adopt a rule for those sources is not applicable. This process is called "Negative Declaration".

The District is required to submit Negative Declarations for all CTG categories for which there are no sources above the CTG recommended threshold, even if such negative declarations were made for an earlier SIP. This is necessary since there may be sources in the non-attainment area that previously did not exist. Also, if the boundaries of the non-attainment area have expanded, there may be sources in the new portion of the non-attainment area which should not be overlooked.

The District must also submit a Negative Declaration to certify that there are no Major non-CTG Sources in the non-attainment area.

The Negative Declaration must go through the same public review requirements as any other SIP submittal.

Negative Declaration Findings and Staff Recommendations

The District Staff reviewed permit databases, SIC codes, business license applications, telephone listings, other source data and the emission inventory for its Federal Clean Air Plan, and has determined that there are no Major Stationary sources or emitting facilities for the CTG categories listed below in Table C.

Placer County Air District Board Resolutions #97-33 and #97-34 stated that there were no Major Sources to regulate for VOC or NOx in a total of twelve source categories (7 VOC source categories, 5 NOx source categories). The negative findings were made as part of a RACT SIP analysis following the issuance by U.S. EPA of deficiency findings in 1994 for all of California's 15% Rate-of-Progress Plans, including that of Placer County. The Negative Declarations for these twelve rule categories were later approved by the U.S. EPA in Federal Register Notice FR 50766, September 23, 1998. The U.S. EPA commented that a thirteenth Negative Declaration category (Synthetic Organic Chemical Manufacturing Industry - Distillation) needed to be adopted by the District Board.

Staff has reaffirmed that there are no existing Major Sources of emissions in these twelve (12) rule categories and the Negative Declarations for both new and affirmed rule categories should be submitted to U.S. EPA for approval. The twelve Negative Declaration rule categories, including dates approved, are listed in the following Table C. Seventeen (17) other rule categories, including the "Synthetic Organic Chemical Manufacturing Industry – Distillation" category noted by U.S. EPA, were found to have no existing Major Sources in the District. The District does not anticipate Major Sources in these rule categories in the future. Staff will submit these twenty-nine (29) Negative Declarations for public comment, and District Board consideration and approval. If approved by the District Board the Negative Declarations will be submitted to CARB for forwarding to U.S. EPA as requested revisions to the State Implementation Plan.

	Table C - District Negative Declaration Submittal Requirements										
	Rule Title	Date Submitted	Board Resolution	Pollutant							
U.S.	U.S. EPA Source Categories That Need to Have Previous Negative Declarations Affirmed										
1	Aerospace	10/9/97	97-33	VOC							
2	Plastic Parts Coating - Business Machines	10/9/97	97-33	VOC							
3	Plastic Parts Coating - Other	10/9/97	97-33	VOC							
4	Ships	10/9/97	97-33	VOC							
5	Synthetic Organic Chemical Manufacturing - Batch Plants	10/9/97	97-33	VOC							
6	Synthetic Organic Chemical Manufacturing - Reactors	10/9/97	97-33	VOC							
7	Utility Boilers	10/9/97	97-34	NOx							
8	Cement Kilns	10/9/97	97-34	NOx							
9	Glass Treatment	10/9/97	97-34	NOx							
10	Iron and Steel Manufacturing	10/9/97	97-34	NOx							
11	Nitric and Adipic Acid Manufacturing	10/9/97	97-34	NOx							

	Table C - District Negative Declaration Submittal Requirements										
	Rule Title	Date Submitted	Board Resolution	Pollutant							
12	Industrial Waste Water Treatment	10/9/97	97-33	VOC							
Other	U.S. EPA Source Categories That N	leed to Have Firs	t-Time Negative	e Declarations							
1	Synthetic Organic Chemical Manufacturing, Distillation	N/A	N/A	VOC							
2	Large Appliances	N/A	N/A	VOC							
3	Magnet Wire	N/A	N/A	VOC							
4	Metal Furniture	N/A	N/A	VOC							
5	Traffic Marking	N/A	N/A	VOC							
6	Natural Gas/Gasoline Plants	N/A	N/A	VOC							
7	Refineries	N/A	N/A	VOC							
8	Bakeries	N/A	N/A	VOC							
9	Ethylene Oxide	N/A	N/A	VOC							
10	Fertilizer	N/A	N/A	VOC							
11	Ink and Paint Manufacturing	N/A	N/A	VOC							
12	Leather Tanning	N/A	N/A	VOC							
13	Pesticides	N/A	N/A	VOC							
14	Pharmaceutical Products	N/A	N/A	VOC							
15	Polyester Resin (Manufacturing)	N/A	N/A	VOC							
16	Rubber Tires	N/A	N/A	VOC							
17	Sulfuric Acid	N/A	N/A	VOC							

Part 3 - <u>SIP Approval Status: Identify all District rules subject to the U.S. EPA CTG source categories within the District and determine if they meet RACT standards.</u>

The current status of each of the thirty-two (32) District prohibitory rules that previously were adopted for CTG/ACT/AFM source categories was reviewed and is displayed in the following tables. This SIP status study was necessary in order to determine which rules, if any, needed to be submitted or re-submitted for SIP approval by U.S. EPA. The following lists the SIP status categories that were examined:

- a. Rules that were submitted and approved for SIP.
- b. Rules that were submitted and approved for SIP and that must be re-submitted for approval because of amendments that post-dated the SIP approval.
- c. Rules that have not yet been submitted for SIP approval.
- d. Rules that were submitted for SIP approval and which are awaiting approval. (None were in this category).

Staff examined the adoption dates of the above rules, and the dates of the latest amendments, if any. Then the date of SIP approval was compared with the rule adoption histories. Any rule that was last amended six months to a year before the Federal Register SIP approval date was considered to not need SIP resubmittal. In some cases the dates were close and Staff researched the SIP approval records to determine if the rule, as currently amended was the one that was examined and approved by U.S. EPA.

Table D-1 - District Rule History (VOC and NOx) and SIP Approval Status:

Table D-1 lists the adoption history of the District rules (VOC and NOx) and their SIP approval status. They are listed by rule number. Rule 227 (Petroleum Dry Cleaning Operations) is omitted since there are no sources in the District. Dry Cleaners in the District now use Perchloroethylene (PERC) solvent, which is exempted from the VOC classification. PERC regulations are included in a MACT standard. The right hand column indicates if the District must re-submit any existing rule that was amended after the latest date of SIP approval, in order to ensure that the review will be based upon the most current amendment of that rule. Staff recommends that these SIP submittals be found exempt from the California Environmental Quality Act (CEQA). The proposed submittals are exempt from CEQA as per Title 14, Calfornia Code of Regulations, Chapter 3, Article 19, Section 15308, Actions by Regulatory Agencies for the Protection of the Environment.

	Table D-1 - District Rule History (VOC and NOx) and SIP Approval Status											
Rule No.	Rule Title	Pollutant Control- led	CTG Source ?	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approva I Require d?					
206	Incinerator Burning	NOx	No	11/12/74	11/3/94	11/15/78 43 FR 53035	Y					
209	Fossil Fuel-Steam Facility	NOx	No	11/12/74	5/24/77	6/14/78 - 43 FR 25684	Ν					
212	Storage of Organic Liquids	VOC	No	5/24/77	6/19/97	5/6/96 - 61 FR 20145	Y					
213	Gasoline Transfer into Stationary Storage Containers	VOC	Yes	6/19/79	10/19/93	4/30/97 - 62 FR 23365	N					
214	Transfer of Gasoline into Vehicle Fuel Tanks	VOC	Yes	6/19/79	4/21/81	4/30/97 - 62 FR 23365	N					
215	Transfer of Gasoline into Tank Trucks, Trailers and Railroad Tank Cars at Loading Facilities	voc	Yes	6/19/79	Not amended	5/6/96 - 61 FR 20145	Υ					
216	Organic Solvent Cleaning and Degreasing Operations	VOC	Yes	6/19/79	12/11/03	4/30/96 - 61 FR 18962	Y					
217	Cutback and Emulsified Asphalt Paving Materials	VOC	Yes	6/19/79	9/25/90	4/30/97 - 62 FR 23365	N					
218	Architectural Coatings	VOC	No	6/19/79	12/13/01	7/18/96 - 61 FR 37390	Y					
219	Organic Solvents	VOC	Yes	6/19/79	5/20/85	4/30/97 - 62 FR 23365	N					

	Table D-1 - Dist	rict Rule H	istory (V	OC and NC	x) and SIP	Approval Statu	ıs
Rule No.	Rule Title	Pollutant Control- led	CTG Source ?	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approva I Require d?
222	Reduction of Animal Matter	N/A	N/A	6/19/79	Not amended	4/30/97 - 62 FR 23365	N
223	Metal Can Coating	VOC	Yes	9/25/90	10/6/94	3/23/95 - 60 FR 15241	N
225	Wood Fired Appliances	N/A	N/A	6/17/86	Not amended	4/30/97 - 62 FR 23365	N
226	Sulfur Content of Fuels (Tahoe Only)	N/A	N/A	6/19/79	10/19/93	4/30/97 - 62 FR 23365	N
229	Fiberboard Manufacturing	VOC	No	6/28/94	Not amended	6/8/01 - 66 FR 30815	N
230	Plastic Products and Materials - Paper Treating Operation	VOC	Yes	6/28/94	Not amended	12/14/94 - 59 FR 64336	N
231	Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters	NOx	No	10/17/94	10/9/97	Not Submitted	Y
232	Biomass Suspension Boilers	NOx	No	10/6/94	12/9/99	Not Submitted	Y
233	Biomass Boilers	NOx	No	10/6/94	Not amended	4/30/96 - 61 FR 18959	N
234	Automotive Refinishing Operations	VOC	Yes	11/3/94	4/9/98	Not submitted	Y
235	Adhesives	VOC	No	6/8/95	4/8/04	7/18/96 - 61 FR 37390	Y
236	Wood Products Coating Operations	VOC	Yes	11/3/94	8/14/97	4/30/96 - 61 FR 18962	Y
237	Municipal Landfills	voc	No	11/3/94	10/9/03	Not submitted	Y
238	Factory Coating of Flatwood Paneling	VOC	Yes	11/3/94	2/18/04	2/12/96 - 61 FR 5288	Y
239	Graphic Arts Operations	VOC	Yes	11/3/94	4/8/04	11/13/98 63 FR 63410	Υ
240	Surface Preparation and Cleanup	VOC	No	6/8/95	12/11/03	Not submitted	Y
241	Boilers at Plastic Laminate Manufacturing Facilities	NOx	No	4/8/99	Not Amended	Not submitted	Y
242	Stationary Internal Combustion Engines	NOx	No	4/10/03	Not Amended	Not submitted	Y

	Table D-1 - District Rule History (VOC and NOx) and SIP Approval Status											
Rule No.	Rule Title	Pollutant Control- led	CTG Source ?	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approva I Require d?					
243	Polyester Resin Operations	VOC	Yes	4/10/03	Not Amended	Not submitted	Υ					
244	Semiconductor Operations	VOC	No	2/9/95	Not Amended	7/25/96 - 61 FR 38571	N					
246	Natural Gas-Fired Water Heaters	NOx	No	6/19/97	Not Amended	Not submitted	Y					
250	Stationary Gas Turbines	NOx	No	10/17/94	Not Amended	8/23/95 - 60 FR 43713	N					

District Rules Which Were SIP- Approved and Do Not Require Re-Submittal:

Table D-2 lists rules that were submitted for SIP after their latest amendment date and approved. These fourteen (14) rules have been incorporated into the SIP and will not require resubmittal for SIP at this time.

1	Table D-2 - District Rules Which Were SIP- Approved and Do <u>Not</u> Require Re- Submittal											
Rule No.	Rule Title	Pollutant Controlled	CTG Source	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approval Required ?					
209	Fossil Fuel-Steam Facility	NOx	No	11/12/74	5/24/77	6/14/78 - 43 FR 25684	N					
213	Gasoline Transfer into Stationary Storage Containers	VOC	Yes	6/19/79	10/19/93	4/30/97 - 62 FR 23365	N					
214	Transfer of Gasoline into Vehicle Fuel Tanks	VOC	Yes	6/19/79	4/21/81	4/30/97 - 62 FR 23365	N					
217	Cutback and Emulsified Asphalt Paving Materials	VOC	Yes	6/19/79	9/25/90	4/30/97 - 62 FR 23365	N					
219	Organic Solvents	VOC	Yes	6/19/79	5/20/85	4/30/97 - 62 FR 23365	N					
222	Reduction of Animal Matter	N/A	N/A	6/19/79	Not Amended	4/30/97 - 62 FR 23365	N					
223	Metal Can Coating	VOC	Yes	9/25/90	10/6/94	3/23/95 - 60 FR 15241	N					
225	Wood Fired Appliances	N/A	N/A	6/17/86	Not Amended	4/30/97 - 62 FR	N					

٦	Table D-2 - District Rules Which Were SIP- Approved and Do <u>Not</u> Require Re- Submittal											
Rule No.	Rule Title	Pollutant Controlled	CTG Source ?	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approval Required ?					
						23365						
226	Sulfur Content of Fuels (Tahoe Only)	N/A	N/A	6/19/79	10/19/93	4/30/97 - 62 FR 23365	N					
229	Fiberboard Manufacturing	VOC	No	6/28/94	Not Amended	6/8/01 - 66 FR 30815	N					
230	Plastic Products and Materials - Paper Treating Operation	VOC	Yes	6/28/94	Not Amended	12/14/94 - 59 FR 64336	N					
233	Biomass Boilers	NOx	No	10/6/94	Not Amended	4/30/96 - 61 FR 18959	N					
244	Semiconductor Operations	VOC	No	2/9/95	Not Amended	7/25/96 - 61 FR 38571	N					
250	Stationary Gas Turbines	NOx	No	10/17/94	Not Amended	8/23/95 - 60 FR 43713	N					

District Rules Which Were SIP-Approved and Now Require Re-Submittal Because of Amendments:

Table D-3 lists the nine (9) adopted District rules that were approved for SIP previously, and that must now be re-submitted for SIP because of amendments that post-dated the U.S. EPA's SIP approval.

ī	Table D-3 - District Rules Which Were SIP-Approved and Require Re-Submittal Because of Recent Amendments											
Rule No.	Rule Title	Pollutant Control- led	CTG Source?	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approval Required ?					
206	Incinerator Burning	NOx	No	11/12/74	11/3/94	11/15/78 43 FR 53035	Υ					
212	Storage of Organic Liquids	VOC	No	5/24/77	6/19/97	5/6/96 - 61 FR 20145	Y					
215	Transfer of Gasoline into Tank Trucks, Trailers and Railroad Tank Cars at Loading Facilities	VOC	Yes	6/19/79	Not Amended	5/6/96 - 61 FR 20145	Y					
216	Organic Solvent Cleaning and	VOC	Yes	6/19/79	12/11/03	4/30/96 - 61 FR 18962	Y					

Т	able D-3 - District			P-Approvent Amendn	•	ıire Re-Subn	nittal
Rule No.	Rule Title	Pollutant Control- led	CTG Source?	Date Adopted	Date Last Amended	SIP Approval - FR Citation	New SIP Approval Required ?
	Degreasing Operations						
218	Architectural Coatings	VOC	No	6/19/79	12/13/01	7/18/96 - 61 FR 37390	Y
235	Adhesives	VOC	No	6/8/95	4/8/04	7/18/96 - 61 FR 37390	Y
236	Wood Products Coating Operations	VOC	Yes	11/3/94	8/14/97	4/30/96 - 61 FR 18962	Y
238	Factory Coating of Flatwood Paneling	VOC	Yes	11/3/94	2/18/04	2/12/96 - 61 FR 5288	Y
239	Graphic Arts Operations	VOC	Yes	11/3/94	4/8/04	11/13/98 63 FR 63410	Y

District Rules Which Need to be Submitted for SIP Approval:

Table D-4 lists nine (9) newer rules which need to be submitted to the U.S. EPA for first-time SIP approval.

	Table D-4 – Dis	trict Rules	Which Ne	ed to be S	ubmitted fo	r SIP Appro	val
Rule No.	Rule Title	Pollutant Control- led	CTG Source	Date Adopted	Date Last Amended	SIP Approval - FR Citation	SIP Approval Required ?
231	Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters	NOx	No	10/17/94	10/9/97	None	Y
232	Biomass Suspension Boilers	NOx	No	10/6/94	12/9/99	None	Y
234	Automotive Refinishing Operations	VOC	Yes	11/3/94	4/9/98	None	Y
237	Municipal Landfills	VOC	No	11/3/94	10/9/03	None	Y
240	Surface Preparation and Cleanup	VOC	No	6/8/95	12/11/03	None	Y
241	Boilers at Plastic Laminate Manufacturing Facilities	NOx	No	4/8/99	Not Amended	None	Y
242	Stationary Internal Combustion Engines	NOx	No	4/10/03	Not Amended	None	Y

	Table D-4 – Dis	trict Rules	Which Ne	ed to be S	submitted fo	r SIP Appro	val					
Rule No.	Rule Title	Pollutant Control- led	CTG Source	Date Adopted	Date Last Amended	SIP Approval - FR Citation	SIP Approval Required ?					
243	Polyester Resin Operations	VOC	Yes	4/10/03	Not Amended	None	Y					
246	246 Natural Gas-Fired NOx No 6/19/97 Not Amended None Y											

Part 4 - Summary and Conclusions

New RACT Rules to Be Adopted - Details of the process Staff used to evaluate the Applicable SIP status of the District's rules that satisfy Major Source RACT requirements are described in Part 1, above. The Staff comparison of all current District rules to the standards of applicable CTGs, ACTs, and AFMs found that the District has adopted rules corresponding to RACT source categories and that satisfy RACT requirements. Details of the comparison are presented in Table A, of the Appendix. One RACT category, Metal Parts and Products, has non-Major emission source(s), but no District Rule has been adopted. Staff recommends that the Board direct the development and adoption of a rule to limit VOC emissions from the coating of metal parts and products. Although there are no Major Sources in this source category, there are non-Major Sources of VOC that would be subject to a new rule establishing RACT requirements. The rule should be implemented by January 1, 2009, and should be adopted as a revision to the SIP and submitted to U.S. EPA.

Negative Declarations - (Part 2) Based on Staff review of District sources, twelve (12) RACT source categories were identified where previous Negative Declarations (7 VOC, 5 NOx) of no existing Major Stationary Sources to regulate may be reaffirmed. The Negative Declaration of no existing Major Stationary VOC Sources may be made for seventeen (17) additional VOC RACT source categories. In addition, the Staff analysis found that there were no Major Stationary Sources, including Major non-CTG Sources, for which District rules satisfying RACT had not been adopted. Staff recommends that the District Board make the declaration that no existing Major Stationary Sources exist for VOC or NOx in Placer County in the twenty-nine (29) specified RACT source categories and that no Major non-CTG Sources exist for which RACT measures have not been adopted. Staff further recommends that these SIP submittals be found exempt from the California Environmental Quality Act (CEQA) per Title 14, California Code of Regulations, Chapter 3, Article 19, Section 15308, Actions by Regulatory Agencies for the Protection of the Environment.

SIP Status – (Part 3) Rule adoption, amendment, and SIP approval history for thirty-two (32) District prohibitory rules was reviewed and analyzed. Fourteen (14) SIP-approved rules do not require re-submittal for SIP status. Nine (9) previously SIP approved rules must be re-submitted because of amendments that post-dated the original approvals. Nine (9) newer District rules were adopted and need to be submitted for first-time approval and revision of the SIP. Staff recommends that the District Board direct and approve the submittal of the specified rules, previously adopted by the District Board of Directors, to the U.S. EPA as revisions to the SIP.

Appendix: Table A – CTG Rule Analysis Table with Rule Categories as Listed in U.S. EPA Letter to CARB, 4/4/06

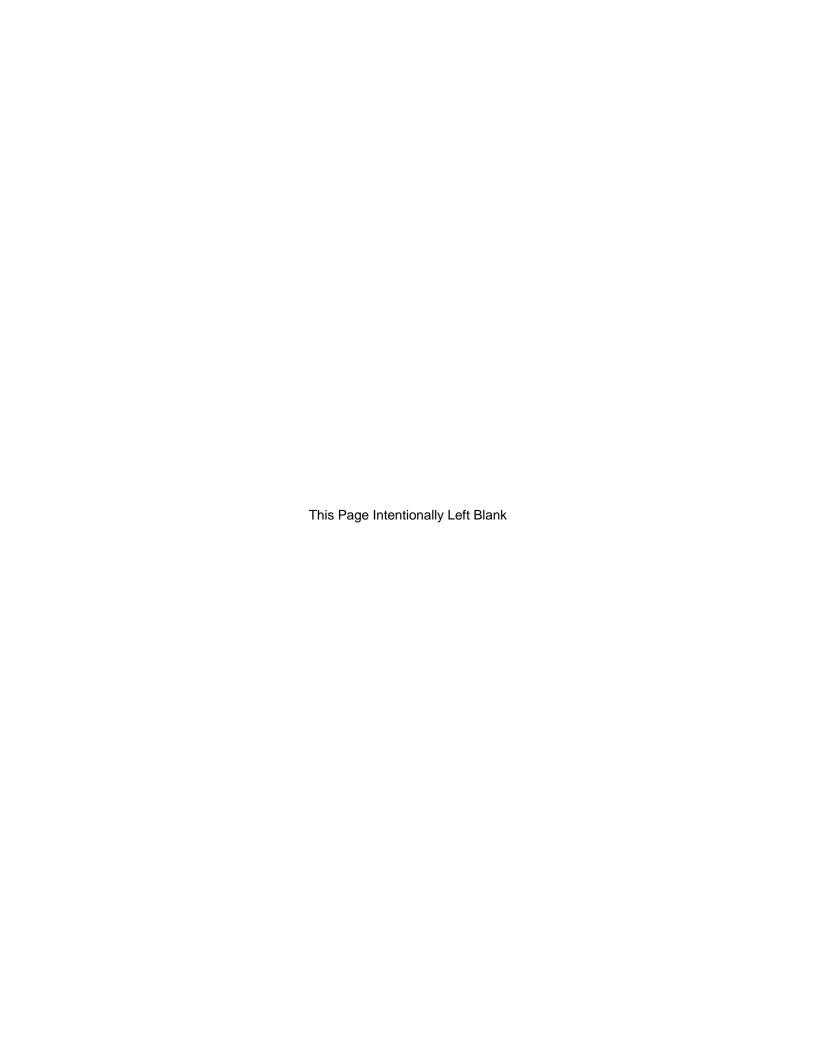
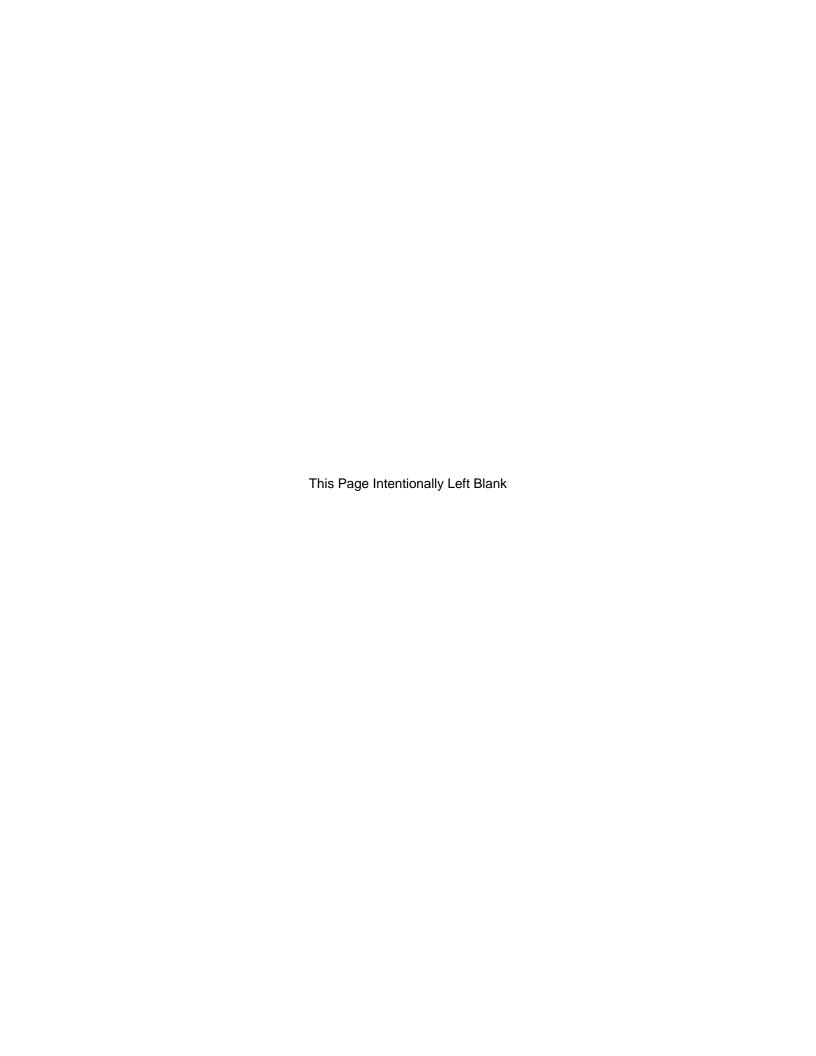


Table A - CTG Rule Analysis Table with Rule Categories as Listed in U.S. EPA Letter to CARB, 4/4/06



	LE A - CTG RULE ANALYSIS TEGORIES AS LISTED IN U.S.	TABLE EPA LETTER TO CARB, DATED 0	4/04/06)	EXISTING	SOURCES	PLACE	ER CO. APCD RULE	ADOPTION	DATES AND SI	PAPPROVAL	RULE MEETS RACT
SOURCE CATEGORY	EPA CONTROL TECHNOLOGY GUIDANCE DOCUMENT, (CTG)	CARB ALL FEASIBLE MEASURES (AFM)	ALTERNATIVE CONTROL TECHNIQUES (ACT)	MAJOR SOURCES - NOX or VOC	NON-MAJOR SOURCES? (Y/N)	RULE NO.	TITLE	RULE ADOPTION DATE	RULE LATEST REVISION DATE	SIP APPROVAL DATE	REQUIREMENTS
Coatings & So	Ivents										
Aerospace	(P4) Control of VOC Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations CTG & MACT (See 59 FR 29216, 6/6/1994); CTG (Final), EPA-453/R-97-004, 12/97).	In 1998, CARB published an AFM for this category. It compares the Aerospace Coating performance standards for four California Districts with the CTG for US EPA Aerospace Manufacturing and Rework Operations implementation dated 9/1/98 and 9/1/99.	None	None	Negative Declaration for Aerospace Coatings Stationary VOC Sources was Board- Approved on 10/9/97. Resolution # 97 33	No Rule					
Architectural Coatings	None	No CTG has been established for this specific type of source. National VOC Emission Standards for Architectural Coatings were established on 9/11/98, (40 CFR59, Subpart D). Subsequent to that time, the District adopted Rule 218. The latest amendment on 12/13/01 specifies allowable VOC content in all coating materials with reductions phased in 6/15/02, 11/103 and 11/104 in line with anticipated technology improvements by Industry. In addition, this rule requires the use of only the most restrictive coatings if more than one is offered by Industry, and other application and administrative requirements. This rule meets RACT standards.	National VOC Emission Standards for Architectural Coatings (40 CFR 59 Subpart D, 9/11/98).	None	Y	218	Architectural Coatings	6/19/79	12/31/01	7/18/96 61 FR 37390	Y
Automobile Coatings	Emissions from Existing Stationary Sources - Volume II: Surface	On 9/11/98, the U.S. EPA published emission standards for Automobile Refinish Coatings. The VOC limits in the national rule can be met easily by coating manufacturers. These coatings have been successfully used by body shops for several years. In addition to the national rule requirements, Placer Rule 234 imposes strict VOC limits, application methods, cleanup and recordkeeping requirements. Rule meets RACT standards.	2. Reduction of VOC Emissions from Automobile Refinishing (EPA-450/3-88-009, 10/88, NTIS PB-89-148-282), ACT. (A14) 3. ACT Document: Surface Coating of Automotive/Transportation and Business Machine Plastic Parts (EPA-453/R-94-017, 2/94, NTIS PE 94-158-086). (A15) 4. ACT Document: Auto. Refinishing (EPA-453/R-94-031, 4/94, NTIS PB-94-191-699). Note a national rule was issued in 1998 after the ACT. See 40 CFR 59.100. 5. National VOC Emission Standards for Automobile Refinish Coatings (40 CFR 59	None	Y	234	Automotive Refinishing Operations	11/3/94	4/9/98	Not Submitted	Y
Surface Coating	None	No AFM is available for this specific category. Placer County Rule 240 contains detailed standards for solvent specifications and application methods. Rule 240 was recently amended on 12/11/03, and defines specific requirements to meet or exceed any known regulations. Rule meets RACT standards.	None	Pabco dba Gladding MacBean pending Title V VOC		240	Surface Preparation and Cleanup	12/1/03	12/1/03	Not Submitted	Y

	LE A - CTG RULE ANALYSIS TEGORIES AS LISTED IN U.S.	TABLE EPA LETTER TO CARB, DATED 04	4/04/06)	EXISTING	SOURCES	PLACE	ER CO. APCD RULE	ADOPTION	DATES AND SI	PAPPROVAL	RULE MEETS RACT
SOURCE CATEGORY	EPA CONTROL TECHNOLOGY GUIDANCE DOCUMENT, (CTG)	CARB ALL FEASIBLE MEASURES (AFM)	ALTERNATIVE CONTROL TECHNIQUES (ACT)	MAJOR SOURCES - NOX or VOC	NON-MAJOR SOURCES? (Y/N)	RULE NO.	TITLE	RULE ADOPTION DATE	RULE LATEST REVISION DATE	SIP APPROVAL DATE	REQUIREMENTS
Adhesives and Sealants	None	Placer County Rule 235 standards for VOC content and application methods for adhesives and primers met or exceeded those in the 10/98 RACT and BARCT. Rule 235 was last amended on 4/08/04. That amendment updated VOC reductions commensurate with availability of lower VOC coatings and solvents effective 04/05/05. This rule was updated after the 7/12/02 amendment of SCAQMD, Rule 1168. Rule 235 meets RACT standards.		None	Y	235	Adhesives	6/8/95	4/8/04	7/18/96 61 FR 37390	Y
Factory Coating of Flatwood Paneling	Sources, Volume VII: Factory Surface of Flat Wood Paneling	No AFM has been established for this specific type of source. The existing rule 238 requires (1) specific VOC limits for the coatings, and inks and (2) low-emission application methods and (3) an option for using a District-approved Emission Control System. CTG #15, describes the relative ability of suppliers in 1978 to produce acceptable water-based coatings. The VOC content allowed in PCAPCD Rule 238 for inks and topcoats is significantly lower than those referenced in this CTG. Rule 238 as recently amended in 2004, meets and/or exceeds the available and allowable VOC limitations presented in 1978. Rule 238 meets RACT standards.	None	Pacific MDF Products (Pending Title V) - VOC	Y	238	Factory Coating of Flatwood Paneling	11/3/94	2/18/04	2/12/96 61 FR 5288	Y
Graphic Arts	Emissions from Existing Stationary		(A17) 3. ACT Document: Offset Lithographic Printing (EPA-453/R- 94-054, 6/94, NTIS PB-95-201- 018).	None	Y	239	Graphic Arts Operations	11/3/94	4/8/04	Not Submitted	Y
Large Appliances	(#9) Control of Volatile Organic Emissions from Existing Stationary Sources, Volume V: Surface Coating of Large Appliances, EPA-450/2-77- 034, NTIS PB-278-259), CTG.		None	None	N	No Rule					
Magnet Wire	(#8) 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, NTIS PB-278-258), CTG.	None	None	None	N	No Rule					

	LE A - CTG RULE ANALYSIS TEGORIES AS LISTED IN U.S.	TABLE EPA LETTER TO CARB, DATED 0	4/04/06)	EXISTING	SOURCES	PLACE	ER CO. APCD RULE	ADOPTION	DATES AND SII	P APPROVAL	RULE MEETS RACT
SOURCE CATEGORY	EPA CONTROL TECHNOLOGY GUIDANCE DOCUMENT, (CTG)	CARB ALL FEASIBLE MEASURES (AFM)	ALTERNATIVE CONTROL TECHNIQUES (ACT)	MAJOR SOURCES - NOX or VOC	NON-MAJOR SOURCES? (Y/N)	RULE NO.	TITLE	RULE ADOPTION DATE	RULE LATEST REVISION DATE	SIP APPROVAL DATE	REQUIREMENTS
Metal Coil, Container, and Closure		On 5/77, the U.S. EPA published CTG #3, emission standards for surface coatings of cans and other products. The VOC limits in the national rule can be met by coating manufacturers. In addition to the national rule requirements, Placer Rule 223 imposes strict VOC limits, application methods, cleanup and recordkeeping requirements. Rule meets RACT standards.	2. Reduction of VOC Emissions from Automobile Refinishing (EPA-450/3-88-009, 10/88, NTIS PB-89-148-282), ACT. (A14) 3. ACT Document: Surface Coating of Automotive/Transportation and Business Machine Plastic Parts (EPA-453/R-94-017, 2/94, NTIS PB-94-158-086). (A15) 4. ACT Document: Auto. Refinishing (EPA-453/R-94-031, 4/94, NTIS PB-94-191-699). Note a national rule was issued in 1998 after the ACT. See 40 CFR 59.100. 5. National VOC Emission Standards for Automobile Refinish Coatings (40 CFR 59 Subpart B, 9/11/98).	None	Y	223	Metal Can Coating	9/25/90	10/6/94	3/23/95 60FR 15241	Y
Metal Furniture	(#7) Control of Volatile Organic Emissions from Existing Stationary Sources, Volume III: Surface Coating of Metal Furniture (EPA- 450/2-77-032, 12/77, NTIS PB- 278-257), CTG	On 10/1/98, CARB published Performance Standards for this category. It compares standards of five California Air Districts, including Sacramento. Since PCAPCD has no sources, a Neg. Dec. for this category is needed.	None	None	N	No Rule					
Metal Parts and Products	(#14) Control of Volatile Organic Emissions from Existing Stationary Sources, Volume VI: Surface Coating of Miscellaneous Metal Parts and Products (EPA-450/2- 78-015, 6/78, NTIS PB-286-157), CTG.	None	None	None	Y	No Current Rule - Rule is Needed					
Paper and Fabrics		The AFM that relates to this category, "Surface Coating of Plastic Parts and Products" was prepared by CARB in 10/98. VOC prohibitions in the Placer Rule 230, "Surface Coating of Plastic Parts and Products, Paper Treating Operation", which concern only paper substrates are stricter than those of that AFM, and also the requirements contained in CTG #3. Rule 230 allows the use of either two specific low-VOC treater materials or an approved emission control system that captures at least 85 weight percent VOC emissions. Rule 230 meets RACT standards.	None	Formica Corp. (Title V) VOC	N	230	Plastic Products and Materials - Paper Treating Operation	6/28/94	6/28/94	12/14/94 59 FR 64336	Y
Plastic Parts	None	None	ACT Document: Surface Coating of Automotive/Transportation and Business Machine Plastic Parts (EPA 453/R-94-017, 2/94). See Automobile Coating.	None	Negative Declaration for Plastic Parts Coatings was Board- Approved on 10/9/97. Resolution # 97 33	No Rule					

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SOURCE CATEGORY	EPA CONTROL TECHNOLOGY GUIDANCE DOCUMENT, (CTG)		ALTERNATIVE CONTROL TECHNIQUES (ACT)	MAJOR SOURCES - NOX or VOC	NON-MAJOR SOURCES? (Y/N)	RULE NO.	TITLE	RULE ADOPTION DATE	RULE LATEST REVISION DATE	SIP APPROVAL DATE	REQUIREMENTS
Ships	(P3) (A16) 1. ACT Document: Surface Coating Operations at Shipbuilding and Ship Repair Facilities (EPA-453/R-94-032, 4/94, NTIS PB-94-181-864). The ACT was superseded by the Shipbuilding CTG which was issued in 1996. (P3) CTG, see 61 FR 44050, 8/27/96. FR notice.			None	Negative Declaration for Ship Building and Repair Stationary VOC sources was Board- Approved on 10/9/97. Resolution # 97 33	No Rule					
Solvent Cleaning	(#4) 1. Control of Volatile Organic Emissions from Solvent Metal Cleaning, (EPA-450/2-77-022, 11/77, NTIS PB-274-557), CTG	PCAPCD Rule 216 specifies required operating equipment and control methods for degreasers. After adoption in 1979, it was amended five times, with the most recent amendment on 12/11/03. CTG 4/4 addresses the basic controls that were available in 1977. Rule 216 meets RACT standards.	(A4) 2. ACT Document - Halogenated Solvent Cleaners (EPA-450/3-89-030, 8/89, NTIS PB- 90-103-268). (A13) 3. ACT Document: Industrial Cleaning Solvents (EPA-453/R-94- 015, 2/94, NTIS PB-94-156-79).	None	Y	216	Organic Solvent Cleaning	06/19/79	12/11/03	4/30/1996 61 FR 18962	Y
Semiconductor Operations	None	No AFM or CTG has been published for this rule category. Rule 244 concerns solvent cleaning station operating standards. It contains a compliance schedule for reservoirs and sinks by 31/99. This requires adherence to Rule 219, Organic Solvents, Rule 212, Storage of Petroleum Products and strict recordkeeping and reporting. A comparison of Rule 244 with South Coast Rule 1164 and with Bay Area Rule 8.30 showed that both rules have some additional provisions that might be appropriate for Rule 244, depending upon the future product uses by the source. The District will monitor this source to determine if a amendment might be appropriate. At this time, the District concludes that Rule 244 meets current RACT standards.	None	None	Y	244	Semiconductor Operations	2/9/95	2/9/95	7/25/96 61 FR 38571	Y
Traffic Marking	None	None	(A2) Reduction of VOC Emissions from the Application of Traffic Markings (EPA-450/3-88-007, 8/88, NTIS PB-89-148-274, ACT). The Architectural and Industrial Maintenance Coatings rule included limits for traffic markings and superseded the ACT. See 40 CFR 59.400. EPA R9 has an electronic copy.	None	N	No Rule					

	LE A - CTG RULE ANALYSIS FEGORIES AS LISTED IN U.S.	TABLE EPA LETTER TO CARB, DATED 0	4/04/06)	EXISTING	SOURCES	PLACE	ER CO. APCD RULE	ADOPTION	DATES AND SIF	PAPPROVAL	RULE MEETS RACT
SOURCE	EPA CONTROL TECHNOLOGY GUIDANCE DOCUMENT, (CTG)	CARB ALL FEASIBLE MEASURES (AFM)	ALTERNATIVE CONTROL TECHNIQUES (ACT)	MAJOR SOURCES - NOX or VOC	NON-MAJOR SOURCES? (Y/N)	RULE NO.	TITLE	RULE ADOPTION DATE	RULE LATEST REVISION DATE	SIP APPROVAL DATE	REQUIREMENTS
Wood Furniture	(P2) Control of VOC Emissions from Wood Furniture Manufacturing Operations CTG-MACT draft MACT our 5-94; Final CTG, EPA-453/R-96-007, 4/96, NTIS PB-96-178-769), Also see 61 FR 25223 and 61 FR 50823, 9/27/96.	On 5/15/98, CARB published Performance Standards for this category. This compared equivalent standards of five California Air Districts. Subsequent to that publication, PCAPCD adopted an amended rule 236 This amendment updated VOC limits effective up to 6/30/05. It then requires considerably reduced VOC limits beginning on 7/1/05. These reduced limits reflect the low-VOC content of currently available coating materials. Rule 236 meets RACT standards.	(A1) Control Techniques for Organic Emissions from Plywood Veneer Dryers, EPA-450/3-83-012. May 1983. This document is labeled as a control technique document (CTD) rather than an ACT. However, the information is similar to that in an ACT.	None	Y	236	Wood Products Coating Operations	11/3/94	8/14/97	4/3/96 61 FR 188962	Y
Petroleum											
Gasoline Plants	(#10) Control of Volatile Organic Emissions from Bulk Gasoline Plants (EPA-450/2-77-035, 12/77, NTIS PB-276-722), CTG. EPA R9 has an electronic copy.	The CARB AFM for this category was last revised on 3/1/98. It compares sources on rules from four major California Air Districts and National Emission Standards (40 CFR 63 R). Rule 215 has similar control measures. In 2003, Emission Inventory and Control Methods for five Sacramento area Air Districts were compared. Rule 215 meets RACT standards.	None	None	N	215	Transfer of Gasoline into Tank Trucks, Trailers and Railroad Tank Cars at Loading Facilities	6/19/79	6/19/97	5/6/96 61 FR 20105	Υ
Natural Gas/Gasoline	(#26) Control of VOC Equipment Leaks from Natural Gas/Gasoline Processing Plants (EPA-450/2-83- 007, 12/83, NTIS PB-84-161-520), CTG. EPA R9 has an electronic copy.	None	None	None	N	No Rule					
Refineries	(#5) 1. Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds, (EPA- 450/2-77-025, 10/77, NTIS PB- 275-662), CTG. Control of VOC leaks from Petroleum Refinery Equipment (EPA-450/2-78-036, 6/78, NTIS PB-286-158), CTG. EPA R9 has an electronic copy.	The AFM that relates to this category was last revised by CARB in 10/98. It describes detailed requirements applicable to just the Bay Area AQMD. Placer County has no refinery sources.	3. Petroleum Refinery Tier 2 BACT Analysis Report (Eastern Research Group for EPA, 1/16/01 (A5) 4. ACT Document - Organic Waste Process Vents (EPA-450/3-91-007, 12/90 NTIS PB91-148270) 5. Control Technology Center Document - Industrial Wastewater Volatile Organic Compound Emissions - Background Information for BACT/LAER Determinations (EPA-40/3-90-004, NTIS PB90-194754)	None	N	No Rule					
Service Stations		No AFM has been promulgated for this source category. Sources in Placer County are subject to Rule 214. This rule requires adherance to the CARB standards for nozzles, inspection and maintenance. This rule meets the requirements of RACT.	2. Technical Guidance Stage II Vapor Recovery Systems for Control of Vehicle Refueling Emissions at Gasoline Dispensing Facilities (EPA-450/3-91-022a & b, 11/91).	None	Y	214	Transfer of Gasoline into Vehicle Fuel Tanks	6/19/79	4/21/81	4/30/97 62 FR 23365	Y

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SOURCE CATEGORY	EPA CONTROL TECHNOLOGY GUIDANCE DOCUMENT, (CTG)	CARB ALL FEASIBLE MEASURES (AFM)	ALTERNATIVE CONTROL TECHNIQUES (ACT)	MAJOR SOURCES - NOX or VOC	NON-MAJOR SOURCES? (Y/N)	RULE NO.	TITLE	RULE ADOPTION DATE	RULE LATEST REVISION DATE	SIP APPROVAL DATE	REQUIREMENTS
Synthetic Organic Chemicals	(#28) 1. Control of VOC Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry (EPA-450/3-84-015, 12/84, NTIS PB-85-164-275), CTG. EPA R9 has an electronic copy. (P1) 2. Control of VOC Emissions from Reactor Processes and Distillation Operations in SOCMI (EPA-450/4-91-031, 11/15/93, NTIS PB-92-180-009), CTG. EPA R9 has an electronic copy	None	None	None	Negative Declaration for Batch Plants and Continuous Plants Stationary VOC sources was Board- Approved on 10/9/97 Resolution # 97 33 Neg. Dec. for Distillation Plants, is pending.	No Rule					
Tanks	(#11) 1. Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed Roof Tanks (EPA-450/2-77-036, 12/77, NTIS PB-276-749), CTG. (#20) 2. Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks (EPA-450-2/78-047, 12/78, NTIS PB-290-579), CTG.	National Emission Standards (40 CFR 63 R) . Rule 213 has similar control measures. Rule 213 meets RACT	(A11) 3. Volatile Organic Liquids Storage in Floating and Fixed Roof Tanks (EPA-453/R-94-001, 2/94, NTIS PB-94-152-741), ACT.	None	Y	213	Gasoline Transfer into Stationary Fuel Containers	6/19/79	10/19/93	4/30/97 62 FR 23365	Y
Tank Trucks	(#6) 1. Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals (EPA-450/2-77-026, 12/77, NTIS PB-275-060), CTG. EPA R9 has an electronic copy. (#22) 2. Control of VOC Leaks from Gasoline Tank Trucks and Vapor Collection Systems (EPA-450/2-78-051, 12/78, NTIS PB-290-568), CTG. EPA R9 has an electronic copy.	The CARB AFM for this category was last revised on 3/1/98. It compares sources on rules from four major California Air Districts and National Emission Standards (40 CFR 63 R). Rule 213 has similar control measures. Rule 215 meets RACT standards.		None	Y	215	Transfer of Gasoline into Tank Trucks, Trailers and Railroad Tank Cars at Loading Facilities	6/19/79	6/19/97	5/6/96 61 FR 20145	Y
Combustion											
Boilers, Steam Generators, Process Heaters	None	Placer County Rule 231, last amended 10/09/97, meets or exceeds the current CARB Performance Standard 7/8/91, determination of RACT and BARCT for Industrial, Institutional and Commercial Boilers, Steam Generators and Process Heaters. Rule 231 meets RACT standards.	(N3) 1. ACT Document NOx Emissions from Process Heaters (Revised) (EPA-453/R-93-034, 9/93). (N5) 2. ACT Document NOx Emissions from Utility Boilers (EPA-453/R-94-023, 3/94). (N7) 3. ACT Document NOx Emissions from Industrial/Commercial/Institutional (ICI) Boilers (EPA-453/R-94-022, 3/94).	N	Y	231	Industrial, Institutional and Commercial Boilers, Steam Generators and Process Heaters	10/17/94	10/9/97	Not Submitted	Υ

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SOURCE CATEGORY	EPA CONTROL TECHNOLOGY GUIDANCE DOCUMENT, (CTG)	CARB ALL FEASIBLE MEASURES (AFM)	ALTERNATIVE CONTROL TECHNIQUES (ACT)	MAJOR SOURCES - NOX or VOC	NON-MAJOR SOURCES? (Y/N)	RULE NO.	TITLE	RULE ADOPTION DATE	RULE LATEST REVISION DATE	SIP APPROVAL DATE	REQUIREMENTS
Boilers, Steam Generators, Process Heaters	None	No AFM is available for this type of specialized industrial boiler. Standards for current Rule 241, recently amended, are considered to be adequate and effective control measures. The amendment of the rule was approved five or more years after the ACT provisions, and meets RACT standards.	(N3) 1. ACT Document NOx Emissions from Process Heaters (Revised) (EPA-453/R-93-034, 9/93). (N5) 2. ACT Document NOx Emissions from Utility Boilers (EPA-453/R-94-023, 3/94). (N7) 3. ACT Document NOx Emissions from Industrial/Commercial/Institutional (ICI) Boilers (EPA-453/R-94-022, 3/94).	Formica Corporation (Title V) NOx	N	241	Boilers at Plastic Laminate Mfg. Facilities	4/8/99	4/8/99	Not Submitted	Y
Boilers, Steam Generators, Process Heaters	None	No AFM is available for this type of specialized industrial boiler. Standards for current Rule 233, recently amended, are considered to be adequate and effective control measures. The amendment of the rule was approved five or more years after the ACT provisions, and meets RACT standards.	(N3) 1. ACT Document NOx Emissions from Process Heaters (Revised) (EPA-453/R-93-034, 9/93). (N5) 2. ACT Document NOx Emissions from Utility Boilers (EPA-453/R-94-023, 3/94). (N7) 3. ACT Document NOx Emissions from Industrial/Commercial/Institutional (ICI) Boilers (EPA-453/R-94-022,	Rio Bravo (Title V) NOx , and Sierra Pacific Industries (Title V) NOx	N	233	Biomass Boilers	10/6/94	10/6/94	4/30/96 61 FR 18959	Y
Boilers, Steam Generators, Process Heaters	None	No AFM is available for this type of specialized industrial boiler. Standards for current Rule 232, recently amended, are considered to be adequate and effective control measures. The amendment of the rule was approved five or more years after the ACT provisions, and meets RACT standards.	(N3) 1. ACT Document NOx Emissions from Process Heaters (Revised) (EPA-453/R-93-034, 9/93). (N5) 2. ACT Document NOx Emissions from Utility Boilers (EPA-453/R-94-023, 3/94). (N7) 3. ACT Document NOx Emissions from Industrial/Commercial/Institutional (ICI) Boilers (EPA-453/R-94-022,	SierraPine, Ltd. (Title V) NOx	N	232	Biomass Suspension Boilers	10/6/94	12/9/99	Not Submitted	Y
Boilers, Utility	None	None	(N3) 1. ACT Document NOx Emissions from Process Heaters (Revised) (EPA-453/R-93-034, 9/93). (N5) 2. ACT Document NOx Emissions from Utility Boilers (EPA-453/R-94-023, 3/94). (N7) 3. ACT Document NOx Emissions from Industrial/Commercial/Institutional (ICI) Boilers (EPA-453/R-94-022, 3/94).	None	Negative Declaration for Utilities Boilers Stationary VOC sources was Board- approved on 10/9/97. Resolution # 97 34	No Rule					
Fiberboard Manufacturing	None	This Placer Rule was adopted in 6/94. No CTG, ACT or AFM is available. It is included in this tabulation because the source was previously classified as Major. It requires that wood fiber dryers must have by 03/95, capture and control systems with overall efficiency of at least 50% by weight, and press vents with overall efficiency of at least 57% by weight. If the approved control systems demonstrate higher efficiency, then the allowable emission rates are decreased accordingly. Complete recordkeeping and reporting are mandatory.		SierraPine, Ltd. (Title V) VOC Recently installed new VOC controls. Source is no longer Major.	N	229	Fiberboard Manufacturing	6/28/94	6/28/94	6/8/01 66 FR 30815	Y

	LE A - CTG RULE ANALYSIS TEGORIES AS LISTED IN U.S.	TABLE EPA LETTER TO CARB, DATED 0	4/04/06)	EXISTING	SOURCES	PLACE	ER CO. APCD RULE	ADOPTION	DATES AND SII	P APPROVAL	RULE MEETS RACT
SOURCE	EPA CONTROL TECHNOLOGY GUIDANCE DOCUMENT, (CTG)	CARB ALL FEASIBLE MEASURES (AFM)	ALTERNATIVE CONTROL TECHNIQUES (ACT)	MAJOR SOURCES - NOX or VOC	NON-MAJOR SOURCES? (Y/N)	RULE NO.	TITLE	RULE ADOPTION DATE	RULE LATEST REVISION DATE	SIP APPROVAL DATE	REQUIREMENTS
Cement Kilns	None	The CARB AFM for this category was last revised on 3/1/98. It compares sources on rules from four major California Air Districts.	(N6) ACT Document NOx Emissions from Cement Manufacturing (EPA-453/R-94-004, 3/94). Updated September 2000. Electronic copy of 1994 doc:	N	Negative Declaration for Cement Manufacturing Stationary VOC sources was Board -proved on 10/9/97. Resolution # 97 34	No Rule					
Gas Turbines	None	No AFM has been promulgated for this source category. Rule 250 establishes maximum 15-minute load standards for NOX emission control for both gas and oil combustion. This rule meets the RACT standards.	(N2) ACT Document NOx Emissions from Stationary Gas Turbines (EPA-453/R-93-007, 1/93).	N	Y	250	Stationary Gas Turbines	10/17/94	10/17/94	8/23/95 60 FR 43713	Y
Glass Furnaces	None		(N8) ACT Document NOx Emissions from Glass Manufacturing (EPA-453/R-94-037, 6/94).	N	Negative Declaration for Glass Treatment Stationary VOC sources was Board- approved on 10/9/97. Resolution # 97 34	No Rule					
Internal Combustion Engines	None	No AFM has been promulgated for this source category. ACT Document N4, last updated 3/00, predated the adoptior of Rule 242. The rule requires annual inspections to meet the VOC standards and limitations of NOx and Commissions for rich burn, lean burn and diesel stationary engines. Rule meets RACT standards.	Emissions from Stationary IC Engines, (EPA-453/R-93-032, 7/93. Updated 9/2000.	N	Y	242	Stationary Internal Combustion Engines	4/10/03	4/10/03	None	Y
Iron and Steel	None		(N9) NOx emissions from Iron and Steel Mills, EPA 453/R-94-065, 9/94. EPA R9 has a copy.	N	Negative Declaration for Iron and Steel Manufacturing Stationary VOC sources was Board- approved on 10/9/97. Resolution # 97 34	No Rule					
Municipal Waste Combustion	None	Rule 206 requirements for NOx exceed the standards in 1.40 CFR 60 subpart Cb. Rule meets RACT standards.	1. 40 CFR 60 subpart Cb - Emission Guidelines and Compliance Schedules for Municipal Waste Combustors	N	Y	206	Incinerator Burning	11/12/74	11/3/94	Not Submitted	Y

	LE A - CTG RULE ANALYSIS TEGORIES AS LISTED IN U.S.	TABLE EPA LETTER TO CARB, DATED 0	4/04/06)	EXISTING	SOURCES	PLACE	ER CO. APCD RULE	ADOPTION	DATES AND SI	P APPROVAL	RULE MEETS RACT
SOURCE	EPA CONTROL TECHNOLOGY GUIDANCE DOCUMENT, (CTG)	CARB ALL FEASIBLE MEASURES (AFM)	ALTERNATIVE CONTROL TECHNIQUES (ACT)	MAJOR SOURCES - NOX or VOC	NON-MAJOR SOURCES? (Y/N)	RULE NO.	TITLE	RULE ADOPTION DATE	RULE LATEST REVISION DATE	SIP APPROVAL DATE	REQUIREMENTS
Other											
Cutback Asphalt	(#12) Control of VOC from Use of Cutback Asphalt (EPA-450/2-77- 037, NTIS PB 278-185), CTG.	Rule 217 requirements meet or exceed the CTG #12 standards. Rule 217 encourages the use of emulsified asphalt by limiting the use of all rapid cure cutback asphalt and slow cure cutback asphalt with lower evaporation temperatures. Rule 217 meets		N	N	217	Cutback and Emulsified Asphalt Paving Materials	6/19/79	9/25/90	4/30/97 62 FR 23365	Y
Bakeries		Yes	(A8) 1. ACT Document - Bakery Oven Emissions (EPA-453/R-92- 017,12/92) 2. Issues Concerning Bakery RACT Requirements 2/8/95	N	N	No Rule					
Dry Cleaning	(#24) Control of VOC Emissions from Large Petroleum Dry Cleaners, EPA-450/3-82-009 9/82 NTIS PB-83-124-875), CTG. EPA R9 has an electronic copy.		(#21) 1. Control of Volatile Organic Emissions from Perchloroethylene Dry Cleaning Systems (EPA-450/2-78-050, 12/78, NTIS PB-290-613), (CTG no longer relevant as PERC is exempted as a VOC -however there is a MACT std for PERC drycleaners. APCD Dry Cleaner sources meet this MACT.)		N	227	Petroleum Dry Cleaning Operations	2/5/91	2/5/91	Not Submitted No Sources	N/A
Ethylene Oxide	None		(A3) ACT Document - Ethylene Oxide Sterilization/Fumigation Operations (EPA-450/3-89-007, 3/89, NTIS PB-90-131-434).	N	N	No Rule					
Fertilizer	None		Control of Fluoride Emissions From Existing Phosphate Fertilizer Plants (EPA-450/2-77-005, 3/77)		N	No Rule					
Ink & Paint Manufacture	None		Control of VOC Emissions from Ink and Paint Manufacturing Processes (EPA-450/3-92-013, 4/92).	N	N	No Rule					
Leather Tanning	None		Air Emissions and Control Technology for Leather Tanning and Finishing Operations (EPA- 453/R-93-025, 6/93).	N	N	No Rule					
Nitric & Adipic Acid	None		(N1) ACT Document Nitric and Adipic Acid Manufacturing Plants (EPA-450/3-91-026, 12/91).	N	Negative Declaration for Nitric and Adipic Acid Manufacturing Stationary VOC sources was Board- approved on 10/9/97. Resolution # 97- 34	No Rule					
Pesticides	None		(A10) Control of VOC Emissions from the Application of Agricultural Pesticides (EPA-453/R-92-011, 3/93, NTIS PB-93-199-131), ACT.	N	N	No Rule					

TABLE A - CTG RULE ANALYSIS TABLE (CATEGORIES AS LISTED IN U.S. EPA LETTER TO CARB, DATED 04/04/06)				EXISTING SOURCES		PLACER CO. APCD RULE		ADOPTION DATES AND SIP APPROVAL			RULE MEETS RACT
SOURCE CATEGORY	EPA CONTROL TECHNOLOGY GUIDANCE DOCUMENT, (CTG)	CARB ALL FEASIBLE MEASURES (AFM)	ALTERNATIVE CONTROL TECHNIQUES (ACT)	MAJOR SOURCES - NOX or VOC	NON-MAJOR SOURCES? (Y/N)	RULE NO.	TITLE	RULE ADOPTION DATE	RULE LATEST REVISION DATE	SIP APPROVAL DATE	REQUIREMENTS
Pharmaceutical Products	(#17) Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products (EPA-450/2-78-029, 1278, NTIS PB-290-580), CTG.			N	N	No Rule					
Polyester Resin	(#25) 1. Control of VOC Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins (EPA-450/3-83-008, 11/83, NTIS PB-84-134-600), CTG. (#27) 2. Control of VOC Fugitive Emissions from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment (EPA-450/3-83-006, 3/84,NTIS PB-84-189-372), CTG.	Yes	Control of VOC Emissions from Manufacture of Styrene-Butadiene Copolymers - Preliminary Draft CTG 4/81. (A6) 4. Polystyrene Foam Manufacturing (EPA 450/3-90-020 NTIS PB91-102111)	N	N	No Rule					
Rubber Tires	(#18) Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires (EPA- 450/2-78-030, 12/78, NTIS PB- 290-557), CTG.			N	N	No Rule					
Sulfuric Acid	None		Control of Sulfuric Acid Mist Emissions from Existing Sulfuric Acid Production Units (EPA-450/2- 77-019, 9/77).	N	N	No Rule					
Wastewater	None	None	(A9) 1. Control of VOC Emissions from Industrial Wastewater CTG draft EPA-453/D-93-056 9/92). (A9) 2. ACT Document: Air Emissions from Industrial Wastewater (4/94), ACT consists of cover memo with option tables and CTG draft.	N	Negative Declaration for Industrial Waste Water Treatment Stationary VOC sources was Board- approved on 10/9/97. Resolution # 97- 33	No Rule					