EL DORADO COUNTY
AIR QUALITY MANAGEMENT DISTRICT

REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT) STATE IMPLEMENTATION PLAN (SIP) UPDATE ANALYSIS STAFF REPORT

2015 Ozone Implementation Rule

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INTRODUCTION

El Dorado County is located in northern California, bordering Sacramento County on the west and the State of Nevada on the east. Air quality attainment planning is under the jurisdiction of the El Dorado County Air Quality Management District (District). El Dorado County is divided into two air basins: the Mountain Counties Air Basin (MCAB); and the Lake Tahoe Air Basin (LTAB). Each air basin has its own meteorological and geographic conditions. Topographically, the MCAB basin consists largely of a succession of east-west canyons and intervening ridges. Elevations range from several hundred feet in the foothills, to over 10,000 feet at the crest of the Sierra.

Surface winds generally flow in a west-east direction, uphill during the day and downhill at night. Pollutant transport is predominantly from the Central Valley. Because much more pollution is emitted in the large urban areas of the Central Valley and San Francisco Bay Area than in the Sierra Nevada, pollutants from those areas have a dominant effect on ozone concentrations in the Mountain Counties.

The U.S. EPA first promulgated the National Ambient Air Quality Standards (NAAQS) for ozone in 1971 with revisions in 1979, 1997, 2008, and 2015. The standard began as a 1-hour averaging time. In July 1997, the U.S. EPA revised the 1-hour ozone standard and replaced it with an 8-hour averaging time standard, which was determined to be more health protective. This standard is met at an air quality monitor when the 3-year average of the annual fourth-highest daily maximum 8-hour average ozone concentration is less than or equal to or less than the standard[1].

The MCAB portion of El Dorado County is included in the Sacramento Federal Ozone Non-Attainment Area (SFNA), which was designated as moderate nonattainment area for the 2015 8-hour Ozone NAAQS (83 FR 25776). In a continuation of the District's strategy for achieving the NAAQS, the District is working with other air districts in the SFNA to submit an 8-hour ozone attainment demonstration plan to U.S. EPA for the 2015 8-hour ozone standard (0.070 ppm).

REASON FOR THIS ANALYSIS

Sections 182(b)(2) and 182(f) of the Federal Clean Air Act require areas designated as ozone non-attainment areas and classified as moderate and above to implement Reasonably Available Control Technology (RACT) for sources subject to Control Techniques Guidelines (CTG) documents issued by U.S. EPA and for "Major Sources" of ozone precursors Volatile Organic Compounds (VOCs) and Oxides of Nitrogen (NOx). 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) which are expected of new sources or Maximum Achievable Control Technology (MACT) levels.

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.

The U.S. EPA's Final Rule for Implementation of the 2015 National Ambient Air Quality Standards for Ozone (83 Fed. Reg. 62998 (December 6, 2018)) requires areas classified as moderate non-attainment or higher to adopt and submit a demonstration that their current rules fulfill 2015 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 continue to represent RACT for 8-hour ozone.

[1] ***Air Quality Designations for Ozone:*** https://www.epa.gov/ozone-designations

DISTRICT PLANNING HISTORY

To improve El Dorado County air quality and achieve NAAQS attainment, the District has prepared and adopted several air quality attainment plans and regulations since 1991. El Dorado County air quality has improved over the past several years. The District adopted the 2008 RACT SIP on January 3, 2017, and the analysis was submitted to U.S. EPA on January 4, 2017. The U.S. EPA issued a Final Rule approving the District's 2008 RACT analysis into the SIP on December 31, 2018 (83 Fed. Reg. 67696) with an effective date of January 30, 2019.

The 2008 RACT SIP analysis concluded that there were no major air pollution sources for areas designated "severe" non-attainment per the federal Clean Air Act (CAA). These are sources which emit or have the potential to emit at least 25 ton per year of VOC or NOx. Negative Declarations were adopted for all source categories for which there is CTG guidance but no operating facilities in the District, or for which there are facilities with emissions below the CTG's applicability threshold.

The District adopted a 2006 RACT SIP analysis on February 6, 2007, for the 1997 ozone NAAQS. The analysis was submitted to the U.S. EPA on July 11, 2007. The analysis included three Negative Declarations: Miscellaneous Metal Parts and Products CTG (EPA 450/2-78-015), Solvent Metal Cleaning CTG (EPA 450/2-77-022), Graphic Arts - Rotogravure and Flexography CTG (EPA 450/2-78-033). The U.S. EPA issued a Direct Final Rule on January 14, 2014 (79 Fed. Reg. 2375) approving these Negative Declarations effective March 17, 2014. The U.S. EPA issued a Final Rule approving the District's 2006 RACT analysis and addition negative declarations into the SIP on April 18, 2014 (79 Fed. Reg. 21849) with an effective date of May 19, 2014.

2015 RACT-SIP ANALYSIS

BACKGROUND

RACT requires that all non-attainment areas classified as "moderate" or above have RACT in place for source categories covered by a CTG document and for major sources that are not subject to a CTG (i.e. a "major non-CTG source"). A "major source" of VOC or NOx in the "moderate" non-attainment area of El Dorado County is defined as an emission source that emits or has the potential to emit at least 100 ton of the pollutant per year (tpy). On May 26, 2020, the Sacramento Federal Nonattainment Area (SFNA) requested a "bump up" to a designation of "serious" in order to allow more time to attain the standard. If that redesignation request is approved by the U.S. EPA, the definition of a "major source" would change to a source that emits or has the potential to emit at least 50 tpy of VOC or NOx. Being conservative, the District used the 50 tpy threshold for the 2015 RACT analysis.

The 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. If there are no existing sources that emit the designated pollutants 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 MCAB portion of the District is the only part subject to RACT. Although the Lake Tahoe area in the LTAB is in attainment of the federal ozone standard, it is designated non-attainment transitional for the state 8-hour ozone standard, which is also 70ppb. Therefore, Lake Tahoe area sources have been included in the analysis below.

In this analysis the District performed the following procedures consistent with the U.S. EPA Region IX guidance for RACT analysis:

Step 1 Identify all CTG categories for which there are no facilities in the District (Table 1).

Step 2 Identify all CTG categories for which there are sources but those sources are below CTG cutpoints (Table 2) and identify all Negative Declarations to be adopted (Table 8).

Step 3 Identify all SIP-approved District rules, determine if there are major sources of emissions or non-major sources still subject to the CTG, and determine if the rule meets RACT standards. (Table 9)

Step 4 Identify District actions required based on the RACT analysis.

MAJOR SOURCES

The District currently has no "major" sources as defined for areas designated "serious" non-attainment per the CAA. These are sources which emit or have the potential to emit at least 50 ton per year of VOC or NOx. This was determined from a review of the District emission inventory database, California Air Resources Board (CARB) emission inventory database, District permit database, internet searches, business listings through the county databases, consultation with District Air Quality Specialists (field inspectors who conduct permitted site visits on a regular basis), and personal knowledge. The District is adopting negative declarations for no major VOC and no major NO_x sources.

Step 1: Identify all U.S. EPA Control Techniques Guidelines (CTG) categories for which there are no facilities in the District.

The Negative Declarations for the CTG categories listed in Table 1 were adopted by the El Dorado County Air Board of Directors on January 3, 2017, and approved by U.S. EPA on December 31, 2018, with an effective date of January 30, 2019 (83 Fed. Reg. 67696). District staff reviewed permit databases, SIC codes, internet searches, business listings in the County databases, and the emission inventory for its Federal Clean Air Plan, consulted with District Air Quality Specialists, and determined that there are still no sources for these CTG categories. As such, the Negative Declarations (83 Fed. Reg. 67696, December 31, 2018) are still valid.

Table 1: CTG Categories with No Sources in El Dorado County

No.	CTG Category	CTG Title	CTG	CTG Date	Reason
1	Aerospace Coating	Aerospace MACT and Aerospace (CTG & MACT)	EPA-453/R-97-004 59 FR 29216; 6/06/94	Dec 1997	No Sources
2	Auto and Light-Duty Truck	Surface Coating of Cans, Coils, Paper, Fabric, Automobiles, and light-Duty Trucks	EPA-450/2-77-008	May 1977	No Sources
		Automobile and Light-Duty Truck Assembly Coatings	EPA 453/R-08-006	Sep 2008	
3	Bulk Loading Terminals	Tank Truck Gasoline Loading Terminals	EPA-450/2-77-026	Oct1977	No Sources
4	Fiberglass Boat Manufacturing	Fiberglass Boat Manufacturing Materials	EPA-453/R-08-004	Sep 2008	No Sources
5	Large Appliance Coating	Large Appliance Coatings	EPA-453/R-07-004 EPA-450/2-77-034	Sep 2007 Dec 1977	No Sources
6	Magnet Wire	Surface Coating of	EPA-450/2-77-033	Dec 1977	No

Table 1: CTG Categories with No Sources in El Dorado County					
No.	**CTG Category**	**CTG Title**	**CTG**	**CTG Date**	**Reason**
	Coating	Insulation of Magnet Wire			Sources
7	Cans, Coils, Paper and Fabric Coatings	Surface Coating of Cans, Coils, Paper, Fabric, Automobiles, and light-Duty Trucks	EPA-450/2-77-008	May 1977	No Sources
8	Metal Furniture Coating	Metal Furniture Coatings	EPA-453/R-07-005	Sep 2007	No Sources
9		Surface Coating of Metal Furniture	EPA-450/2-77-032	Dec 1977	No Sources
10	Flat Wood Paneling Coating	Flat Wood Paneling Coatings	EPA-453/R-06-004	Sep 2006	
11		Factory Surface Coating of Flat Wood Paneling	EPA-450/2-78-032	June 1978	No Sources
12	Natural Gas/Gasoline Processing Plants	Leaks from Natural Gas/Gasoline Processing Plants	EPA-450/3-83-007	Dec 1983	No Sources
13	Paper, Film and Foil Coating	Paper, Film, and Foil Coatings	EPA-453/R-07-003	Sep 2007	No Sources
14	Petroleum Refineries	Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds	EPA-450/2-77-025	Oct 1977	No Sources
15		Leaks from Petroleum Refinery Equipment	EPA-450/2-78-036	June 1978	No Sources
16	Pharmaceutical Products	Manufacture of Synthesized Pharmaceutical Products	EPA-450/2-78-029	Dec 1978	No Sources
17	Polypropylene Resins Manufacturing	Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins	EPA-450/3-83-008	Nov 1983	No Sources
18		Leaks from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment	EPA-450/3-83-006	Mar 1984	No Sources
19	Rubber Tires	Manufacture of Pneumatic Rubber Tires	EPA-450/2-78-030	Dec 1978	No Sources
20	Ship Coating	Shipbuilding and Ship Repair Operations (Surface Coating) ACT Surface Coating at Shipbuilding and Ship Repair Facilities	61 FR 44050 (EPA-453/R-94-032)	Aug 1996 Apr 1994	No Sources
21	Synthetic Organic Chemical Manufacturing	Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry	EPA-450/3-84-015	Dec 1984	No Sources
22	Oil & Natural Gas Industry	Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry	EPA-450/4-91-031	Aug 1993	No Sources
23	Oil & Natural Gas Industry	Oil and Natural Gas Industry	EPA-453-B/16-001	Oct 2016	No Sources

Step 2: **Identify all CTG categories for which there are sources but those sources are below CTG cutpoints and identify all Negative Declarations to be adopted.**

District staff reviewed permit databases, SIC codes, internet searches, business listings through the county databases, permitted sources' annual inspection reports, the District and CARB emissions inventory databases, consulted with District air quality specialists, and determined that the District may have sources for the CTG categories listed in Table 2, but that those sources are below the CTG's applicability cutpoints for that respective category. These CTG categories were included in the Negative Declarations list contained in the 2008 RACT SIP that was approved by the U.S. EPA on December 31, 2018 (83 Fed. Reg. 67696) with an effective date of January 30, 2019.

Table 2: CTG Categories with Sources below CTG Cutpoints

No.	CTG Category	CTG Title	CTG	CTG Date	Reason
24	Adhesives	Miscellaneous Industrial Adhesives	EPA-453/R-08-005	Sep 2008	Sources below CTG cutpoints
25	Graphic Arts	Offset Lithographic Printing and Letterpress Printing	EPA-453/R-06-002	Sep 2006	Sources below CTG cutpoints
26		Flexible Package Printing	EPA-453/R-06-003	Sep 2006	Sources below CTG cutpoints
27		Graphic Arts-Rotogravure and Flexography	EPA-450/2-78-033	Dec 1978	Sources below CTG cutpoints
28	Metal Parts and Products Coatings	Surface Coating of Miscellaneous Metal Parts and Products	EPA-450/2-78-015	June 1978	Sources below CTG cutpoints
29	Metal and Plastic Parts Coatings	Miscellaneous Metal Parts Coatings Table 2 – Metal Parts and Products	EPA 453/R-08-003	Sep 2008	Sources below CTG cutpoints
		Miscellaneous Plastic Parts Coatings Table 3 – Plastic Parts and Products	EPA 453/R-08-003		Sources below CTG cutpoints
		Miscellaneous Plastic Parts Coatings Table 4 – Automotive/Transportation and Business Machine Plastic Parts	EPA 453/R-08-003		Sources below CTG cutpoints
		Miscellaneous Plastic Parts Coatings Table 5 – Pleasure Craft Surface Coating	EPA 453/R-08-003		Sources below CTG cutpoints
		Miscellaneous Plastic Parts Coatings Table 6 – Motor Vehicle Materials	EPA 453/R-08-003		Sources below CTG cutpoints
30	Solvent Cleaning	Solvent Metal Cleaning	EPA 450/2-77-022	Nov 1977	Sources below CTG cutpoints
		Industrial Cleaning Solvents	EPA-453/R-06-001	Sep 2006	Sources below CTG cutpoints
31	Petroleum Dry Cleaning	Large Petroleum Dry Cleaners	EPA-450/3-82-009	Sep 1982	Sources below CTG cutpoints
32	Tanks	Storage of Petroleum	EPA-450/2-77-036	Dec 1977	Sources below

Table 2: CTG Categories with Sources below CTG Cutpoints					
No.	**CTG Category**	**CTG Title**	**CTG**	**CTG Date**	**Reason**
	(Fixed and Floating Roof)	Liquids in Fixed-Roof Tanks and Floating Roof Tanks			CTG cutpoints
33			EPA-450/2-78-047	Dec 1978	Sources below CTG cutpoints
34	Wood Furniture Production	Wood Furniture Manufacturing Operations	EPA-453/R-96-007	Apr 1996	Sources below CTG cutpoints

Adhesives:

The 2008 CTG applies to miscellaneous industrial adhesive application processes at facilities where the total actual VOC emissions from all miscellaneous industrial adhesive application processes, including related cleaning activities, are equal to or exceed 6.8 kg/day (15 lb/day), or an equivalent level such as 3 ton per 12-month rolling period, before consideration of controls. There are no such sources in El Dorado County permitted under Rule 236, Adhesives. Rule 236 applies to facilities that use adhesives, adhesive primers, and adhesive bonding primers in excess of 10 gallons per year or one pint per day[2]. Potential sources of adhesive emissions in El Dorado County include automotive body repair facilities, sign companies, and wood cabinet manufacturing or repair. District staff evaluated potential sources and confirmed there are none in El Dorado County that individually emit more than the 15 lb/day cutpoint and subject to EPA-453/R-08-005. The Negative Declaration for this source category is still valid.

Graphic Arts:

The 2006 Offset Lithographic Printing and Letterpress Printing CTG for graphic arts and associated cleaning materials and fountain solutions applies to offset lithographic printing operations where the actual emissions associated with all aspects of that operation equal or exceed 6.8 kg/day (15 lb/day) of VOC, before consideration of controls. Additionally, the CTG applies to any letterpress printing operation where the actual emissions associated with all aspects of that operation equal or exceed 6.8 kg/day (15 lb/day) of VOC. The latest 2006 flexible packaging printing operations CTG applies to sources emitting at least 6.8 kg/day (15 lb/day) of VOC before consideration of controls.

The District staff reviewed the permit and emissions inventory database and consulted with District inspectors to determine if any graphic arts and printing industry sources in El Dorado County exceed 15 lb/day VOC emissions. There is only one printing company under District permit: Broadridge Customer Communications (previously named DSTOutput); a large, 24-hour, 7 days a week, printer of bills and invoices located in El Dorado Hills. Broadridge Customer Communications doesn't use lithographic or letter press printing techniques and has a facility-wide quarterly VOC permit limit for all printing operations[3]. In the last 8 years, Broadridge Customer Communications' greatest quarterly VOC emissions from printing operations were only 59% of the permit limit. Their average daily VOC emissions are as follows:

Table 3: Broadridge Customer Communications Average Daily VOC Emissions (lb/day)							
2012	2013	2014	2015	2016	2017	2018	2019
11.18	7.8	7.47	9.72	12.6	13.6	14	9

[2] The Industrial Adhesives CTG states: "The recommended (15 lb/day) threshold level is equivalent to the evaporation of approximately two gallons of solvent per day."

[3] Email dated 6/23/2020, from Broadridge Customer Communications HSE manager to District staff stating the facility only uses inkjet and high speed jet printers and doesn't use any lithography or letterpress printing techniques.

The next four largest printing companies in El Dorado County are Imperial Printing, Minuteman Press, Placerville Press, and Century Graphics, Century Graphics is located in El Dorado Hills and all others are in Placerville. Imperial and Minuteman use primarily toners, but they use approximately one 5 lb can of black ink per month and one 2 lb can of colored ink. Placerville Press's Permit to Operate was cancelled in February 2016 as it was determined the facility emitted less than 2 lb/day, which is below the permit exemption found in Rule 501 General Permitting. Century Graphics was also found to be exempt from Rule 501 permitting requirement as it emits less than 2 lb/day of VOC in any 24 hour period. There are also two label printing companies: Grigsby L labels in El Dorado Hills and Perfecto Labels in Diamond Springs. Both do very low volume production and do not use solvent-based inks. All have VOC emissions well below the CTG threshold of 15 lb/day.

The two largest newspapers in El Dorado County are the Mountain Democrat and Tahoe Tribune. The Mountain Democrat and its various versions are printed in Solano County at Daily Republic printing. The Tahoe Tribune is printed at Sierra Nevada Media Group in Carson City, NV. The largest monthly news magazine is Tahoe Mountain News which is likewise printed at Sierra Nevada Media Group. The three largest weekly advertising publications: The Clipper, Goldpanner, and the Windfall, all use Gold Country Media printing in Auburn, CA in the adjacent air District in Placer County. There are no printing companies performing flexible package printing in El Dorado County. Therefore, there are no sources in El Dorado County subject to CTGs EPA-453/R-06-002 and EPA-453/R-06-003.

With respect to the 1978 CTG for rotogravure and flexography, according to Page 2-25 of *"Issues Relating to VOC Regulation cutpoints, Deficiencies, and Deviations: Clarification to Appendix D of November 24, 1987 Federal Register"*[4] published by the EPA on May 25, 1988, Graphic Arts operations sources which do not exceed 100 ton per year potential VOC emissions are exempt from the CTG. The District has evaluated all potential sources of graphic arts operations and determined there are none with the potential to emit 100 ton VOC or more annually.

The Negative Declaration for this source category adopted by the El Dorado County Air Board of Directors on January 3, 2017 and approved by the EPA on December 31, 2018, is still valid.

Metal and Plastic Parts Coatings:

The 2008 CTG for Miscellaneous Metal and Plastic Parts Coatings applies to facilities that coat metal and plastic parts with total actual VOC emissions from all miscellaneous metal product and plastic parts surface coating operations, including related cleaning activities, which equal or exceed 15 lb/day or 2.7 tons in a 12-month rolling period[5], before consideration of controls. Table 4 lists facilities permitted by the District and their maximum allowable emissions and most recent actual emissions:

Table 4: District Metal and Plastic Parts Coatings Permitted Facilities Throughput

Facility	Objects coated	Potential (Permitted) Emissions (ton/yr)	2018 Actual Emissions (lb/yr)
Aerometals	Helicopter parts	2	620
El Dorado Disposal	Metal containers	2	100
Rack-It Truck Racks	Pick-up truck racks	6.95	2,680
SMUD – Riverton Maint	Metal containers	0.5	27
Snowline Engineering	Metal cabinets	2.6	2,599

[4] *Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations: Clarification to Appendix D of November 24, 1987* **Federal Register**, May 25, 1988, Revised January 11, 1990, U.S. EPA, Air Quality Management Division, Office of Air Quality Planning and Standards ("The Blue Book"). https://www.epa.gov/sites/production/files/2016-08/documents/voc_bluebook_25may1988.pdf.

[5] 15 lb/day is roughly equivalent to 2.7 tpy. CTG for Miscellaneous Metal and Plastic Parts Coatings pg 3 https://www3.epa.gov/airquality/ctg_act/200809_voc_epa453_r-08-003_misc_metal_plasticparts_coating.pdf.

South Tahoe Refuse (Tahoe)	Metal Containers	1	120
Western Sign Co.	Metal & plastic signs	1.7	1,220

None of these facilities exceed the 2008 CTG cut point of 2.7 ton per year (5,475 lb/yr) actual emissions and none of them use any VOC control devices. Therefore, there are no sources in El Dorado County subject to CTG EPA-453/R-08-003.

With respect to the 1978, CTG (EPA 450/2-77-015) Surface Coating of Miscellaneous Metal Parts and Products, according to Page 2-16 of *"Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations: Clarification to Appendix D of November 24, 1987 Federal Register"*[6] published by the EPA on May 25, 1988, Miscellaneous Metal Parts sources which do not exceed 10 ton per year potential VOC emissions or 3 lb VOC/hr or 15 lb/day[7] actual emissions before add-on controls are exempt from the CTG. As shown above, the District has evaluated all potential sources of metal parts coatings and determined there are none with the potential to emit 10 ton VOC or more annually before add-on controls.

The Negative Declarations for this source category CTGs (EPA 450/2-77-015, EPA 453/R-08-003) adopted by the El Dorado County Air Board of Directors on January 3, 2017, and approved by the U.S. EPA (83 Fed. Reg. 67696, December 31, 2018) are still valid.

Petroleum Dry Cleaning:

The 1982 CTG for this source category applies to large petroleum dry cleaning facilities consuming more than 32,500 gallons of solvent annually. Dry cleaning facilities under permit with the District, their potential (allowed) emissions and 2018 actual emissions are provided in Table 5:

Table 5: District Petroleum Dry Cleaning Permitted Facilities Actual VOC Emissions

Facility	Process	Potential (Permitted) Emissions (lb/yr)	2018 Actual Emissions (lb/yr)
49er Cleaners	Hydrocarbon Dry to Dry	1,320	264
Cambridge Cleaners	Hydrocarbon Dry to Dry	382	63
Classic Cleaners	Hydrocarbon Dry to Dry	204	163
Green Valley Cleaners	Hydrocarbon Dry to Dry	1,319	102
Johns Cleaners - Tahoe	Hydrocarbon Dry to Dry	384	192
Vaya Clean, LLC (previously named Tahoe One Hour Cleaners) - Tahoe	Hydrocarbon Dry to Dry	189	95

All of these facilities use significantly less solvent than the CTG's applicability threshold. The individual facilities use less than 50 gallons of solvent per year. There are no sources in El Dorado County subject to CTG EPA-450-3-82-009. The Negative Declaration contained in (83 Fed. Reg. 67696, December 31, 2018) is still valid.

[6] *Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations: Clarification to Appendix D of November 24, 1987* Federal Register, May 25, 1988, Revised January 11, 1990, U.S. EPA, Air Quality Management Division, Office of Air Quality Planning and Standards ("The Blue Book")

[7] 15 lb/day is roughly equivalent to 2.7 tpy.

Solvent Cleaning:

The 2006 CTG applies to industries in an ozone nonattainment area that use organic solvent for cleaning operations such as mixing vessels (tanks), spray booths, and parts cleaners, where a facility emits at least 6.8 kg/day (15 lb/day) of VOC before consideration of controls. The cleaning activities for removal of foreign material include actions such as wiping, flushing, or spraying.

The District reviewed the permit database and emissions inventory and consulted with district inspectors to determine if there are any El Dorado County industries using cleaning solvents that exceed 15 lb/day of VOC emissions. Rule 501, General Permitting Requirements, requires a surface coating facility using a combined total of one gallon per day of coating material and solvent or would emit more than 2 lb in any 24 hour period of VOC to have a permit with the District. Table 6 contains all solvent-cleaning users with the 2018 actual daily VOC emissions data from all cleaning and coating operations:

Table 6: District Permitted Solvent Cleaning Actual Emission*

Facility	Industry & Process	Potential (Permitted) VOC Emissions (lb/day)	Actual VOC Emissions (lb/day)
Caliber Collision	Automotive Collision Repair – Surface Prep	6	1.5
Cameron Park Auto Body	Automotive Collision Repair – Surface Prep	15	1.5
Cooks Collision	Automotive Collision Repair – Surface Prep	26	8.4
Doug Veerkamp General Engineering	Construction Company – Construction Equipment Repair – Surface Prep	173	0.99
Frank's Body Shop	Automotive Collision Repair – Surface Prep	82	6
Fulmer's Auto Body	Automotive Collision Repair – Surface Prep	9.9	1.1
G & O Body Shop	Automotive Collision Repair – Surface Prep	10	2.7
Hangtown Body Shop	Automotive Collision Repair – Surface Prep	44.9	1.22
Kniesel's Collision Center	Automotive Collision Repair – Surface Prep	15	1.5
Placerville Body Shop	Automotive Collision Repair – Surface Prep	40	1.5
Solis Collision Center	Automotive Collision Repair – Surface Prep	30	3.4
South Side Auto Body-Tahoe	Automotive Collision Repair – Surface Prep	8	2.3
Steve Stymeist Auto Body	Automotive Collision Repair – Surface Prep	10	2.3
Welcome's Auto Body-Tahoe	Automotive Collision Repair – Surface Prep	10	2.5
Holden Sheetmetal Restoration	Automotive Collision Repair – Surface Prep	9.9	0.76

* From all cleaning and coating operations before consideration of controls.

Most if not all of these facilities have converted to use of water-based solvents and most use acetone as a surface preparation and cleanup solvent, which is a VOC exempt compound. Even though several of the sources above have permit limits exceeding the 15 lb/day applicability threshold of actual emissions from the solvent cleaning CTG, none of the sources exceed 6

lb/day of *total actual* VOC emissions, which includes VOC emissions from both solvents and coatings. Therefore, there are no sources in El Dorado County subject to CTG EPA-453/R-06-001.

Richard Rhoads, Director of the Control Programs Development Division (MD-15) in the EPA's Office of Air Quality Planning and Standards issued a memo dated September 7, 1978 clarifying exemptions to the 1977 CTG. The memo states that in jurisdictions with populations less than 200,000 people, sources not exceeding 100 ton per year potential to emit VOCs are not subject to the CTG. The U.S. Census population of El Dorado County in 2020 is 185,015 people[8]. As shown above, the District has evaluated all potential sources of solvent cleaning and determined there are none with the potential to emit 100 ton VOC or more annually. The Negative Declaration for this source category, CTGs EPA-453/R-06-001 and EPA-450/2-77-022 adopted by the El Dorado County Air Board of Directors on January 3, 2017 and approved by the EPA is still valid.

Tanks, Fixed and Floating Roof:

The CTG for fixed roof petroleum tanks applies to tanks that are greater than 420,000 gallons in capacity used to store crude oil and condensate prior to transfer and to tanks greater than 40,000 gallons that store volatile petroleum liquids with a true vapor pressure greater than 10.5 kPa (1.5psia). The Floating and Fixed Roof Petroleum Tanks Alternative Control Techniques document (ACT) applies to tanks greater than 40,000 gallons[9]. There are no "bulk terminals" (facilities that receive and store petroleum products by pipeline or facilities with >20,000 gallons/day throughput) in El Dorado County. The Negative Declaration previously approved for CTG EPA-450/2-77-026 is still valid. There are three "bulk plants" that have large storage tanks located in Placerville, Diamond Springs, and South Lake Tahoe but each have throughputs of <20,000 gallons/day[10].

These bulk plants are all associated with cardlock gas dispensing facilities. The Placerville site has three 20,000 gallon and one 13,000 gallon above ground tanks. The Diamond Springs site has one 20,000 gallon and two 8,000 gallon tanks "above-ground". South Lake Tahoe has one 20,000 gallon and two 14,000 gallon above ground tanks. All tanks have fixed roofs; there are no floating roof tanks in El Dorado County. Therefore, there are no sources in El Dorado County subject to CTGs EPA-450-2-77-036 or EPA-450-2-78-047.

Wood Furniture Production/Coatings:

The District reviewed the permit database and emissions inventory and consulted with District inspectors to determine if there are any wood furniture coaters in El Dorado County. The 1996 wood furniture coating CTG applies to sources with the potential to emit 25 ton per year of VOC's. The following table contains permitted and exempt wood coating companies operating within El Dorado County and the 2018 actual VOC emissions data:

[8] According to 2020 The California Census Office – El Dorado County Hard-to-Count Fact Sheet**:** https://census.ca.gov/wp-content/uploads/sites/4/2019/06/El-Dorado-County.pdf

[9] The Floating and Fixed Roof Petroleum Tanks Alternative Control Techniques document (EPA-453/R-94-001): Storage of Petroleum Liquids in Floating and Fixed Roof

[10] Bulk gasoline plants are defined as < 20,000 gallons/day throughput. See page 35 of 121, Table 1, Issues Relating to VOC Regulation Cutpoints, Deficiencies, and Deviations: Clarification to Appendix D of November 24, 1987 Federal Register, May 25, 1988, ("The Bluebook"): https://archive.epa.gov/ttn/ozone/web/pdf/voc_bluebook.pdf

Table 7: El Dorado County Wood Furniture Coatings Facilities VOC Emissions			
Facility	Industry or Process	VOC Potential (Permitted) Emissions	**VOC Actual Emissions**
Burleson Antiques	Furniture Refinishing	No permit. VOC emissions <2lb/day[11]	<2lb/day
Cook Custom Cabinets	Cabinet Making/Refinishing	2 ton/year	2,200 lb/yr
Impact Photographics	Wood Display Case Making/Coating	1.5 ton/year	400 lb/yr
Rich & Mike's Cabinets	Cabinet Making & Refinishing	No permit. VOC emissions <2lb/day	<2lb/day
The Door Stop	Door & Window Coating	No permit. VOC emissions <2lb/day	<2lb/day

There are no sources with the potential to emit 25 ton/year or more of VOC and subject to EPA-453/R-96-007. The Negative Declaration (83 Fed. Reg. 67696, December 31, 2018) is still valid.

PROPOSED NEGATIVE DECLARATIONS

The District may elect to submit Negative Declarations for all CTG categories for which there are no sources above the CTG recommended threshold. Negative declarations must be made even if such negative declarations were made for an earlier ozone NAAQS. This is necessary since there may be sources in the non-attainment area that previously did not exist. If the boundaries of the non-attainment area are expanded, there may be sources in the new portion of the non-attainment area which would be evaluated.

The District must also submit a Negative Declaration to certify that there are no Major non-CTG Sources in the non-attainment area. Negative Declarations must go through the same public review requirements as any other SIP submittal. The following table lists all Negative Declarations proposed to be adopted by the District:

Table 8: Proposed Negative Declarations					
No.	**CTG Category**	**CTG Title**	**EPA Report Number**	**CTG Date**	**Reason**
1	Aerospace Coating	Aerospace MACT and Aerospace (CTG & MACT)	EPA-453/R-97-004 59 FR 29216; 6/06/94	Dec 1997	No Sources
2	Auto and Light-Duty Truck	Automobile and Light-Duty Truck Assembly Coatings	EPA-450/2-77-008 EPA 453/R-08-006	May 1977 Sep 2008	No Sources
3	Bulk Loading Terminals	Tank Truck Gasoline Loading Terminals	EPA-450/2-77-026	Oct 1977	No Sources
4	Fiberglass Boat Manufacturing	Fiberglass Boat Manufacturing Materials	EPA-453/R-08-004	Sep 2008	No Sources
5	Large Appliance Coating	Large Appliance Coatings	EPA-453/R-07-004 EPA-450/2-77-034	Sep 2007 Dec 1977	No Sources
6	Magnet Wire Coating	Surface Coating of Insulation of Magnet Wire	EPA-450/2-77-033	Dec 1977	No Sources

[11] District Rule 501 General Permit Requirements (June 6, 2006) Section 501.1.N allows equipment that emits less than 2 pounds of any pollutant in any 24 hour period to be exempted from permitting requirements.

Table 8: Proposed Negative Declarations					
No.	**CTG Category**	**CTG Title**	**EPA Report Number**	**CTG Date**	**Reason**
7	Cans, Coils, Paper and Fabric Coatings	Surface Coating of Cans, Coils, Paper, and Fabric	EPA-450/2-77-008	May 1977	No Sources
8	Metal Furniture Coating	Metal Furniture Coatings	EPA-453/R-07-005	Sep 2007	No Sources
9		Surface Coating of Metal Furniture	EPA-450/2-77-032	Dec 1977	No Sources
10	Flat Wood Paneling Coating	Flat Wood Paneling Coatings	EPA-453/R-06-004	Sep 2006	No Sources
11		Factory Surface Coating of Flat Wood Paneling	EPA-450/2-78-032	June 1978	
12	Natural Gas/Gasoline Processing Plants	Leaks from Natural Gas/Gasoline Processing Plants	EPA-450/3-83-007	Dec 1983	No Sources
13	Paper, Film and Foil Coating	Paper, Film, and Foil Coatings	EPA-453/R-07-003	Sep 2007	No Sources
14	Petroleum Refineries	Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds	EPA-450/2-77-025	Oct 1977	No Sources
15		Leaks from Petroleum Refinery Equipment	EPA-450/2-78-036	June 1978	No Sources
16	Pharmaceutical Products	Manufacture of Synthesized Pharmaceutical Products	EPA-450/2-78-029	Dec 1978	No Sources
17	Polypropylene Resins Manufacturing	Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins	EPA-450/3-83-008	Nov 1983	No Sources
18		Leaks from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment	EPA-450/3-83-006	Mar 1984	No VOC/NOX Sources
19	Rubber Tires	Manufacture of Pneumatic Rubber Tires	EPA-450/2-78-030	Dec 1978	No Sources
20	Ship Coating	Shipbuilding and Ship Repair Operations (Surface Coating) ACT Surface Coating at Shipbuilding and Ship Repair Facilities	61 FR 44050 (EPA-453/R-94-032)	Aug 1996 Apr 1994	No Sources
21	Synthetic Organic Chemical Manufacturing	Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry	EPA-450/3-84-015	Dec 1984	No Sources
22	Oil & Natural Gas Industry	Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry	EPA-450/4-91-031	Aug 1993	No Sources
23	Oil & Natural Gas Industry	Oil and Natural Gas Industry	EPA-453-B/16-001	Oct 2016	No Sources
24	Adhesives	Miscellaneous Industrial Adhesives	EPA-453/R-08-005	Sep 2008	Sources below CTG cutpoints

Table 8: Proposed Negative Declarations					
No.	**CTG Category**	**CTG Title**	**EPA Report Number**	**CTG Date**	**Reason**
25	Graphic Arts	Offset Lithographic Printing and Letterpress Printing	EPA-453/R-06-002	Sep 2006	Sources below CTG cutpoints
26		Flexible Package Printing	EPA-453/R-06-003	Sep 2006	
27		Graphic Arts-Rotogravure and Flexography	EPA-450/2-78-033	Dec 1978	
28	Metal Parts and Products Coatings	Surface Coating of Miscellaneous Metal Parts and Products	EPA-450/2-78-015	June 1978	Sources below CTG cutpoints
29	Metal and Plastic Parts Coatings	Miscellaneous Metal Parts Coatings Table 2 – Metal Parts and Products	EPA 453/R-08-003	Sep 2008	Sources below CTG cutpoints
		Miscellaneous Plastic Parts Coatings Table 3 – Plastic Parts and Products	EPA 453/R-08-003		Sources below CTG cutpoints
		Miscellaneous Plastic Parts Coatings Table 4 – Automotive/Transportation and Business Machine Plastic Parts	EPA 453/R-08-003		Sources below CTG cutpoints
		Miscellaneous Plastic Parts Coatings Table 5 – Pleasure Craft Surface Coating	EPA 453/R-08-003		Sources below CTG cutpoints
		Miscellaneous Plastic Parts Coatings Table 6 – Motor Vehicle Materials	EPA 453/R-08-003		Sources below CTG cutpoints
30	Solvent Cleaning	Solvent Metal Cleaning	EPA 450/2-77-022	Nov 1977	Sources below CTG cutpoints
		Industrial Cleaning Solvents	EPA-453/R-06-001	Sep 2006	Sources below CTG cutpoints
31	Petroleum Dry Cleaning	Large Petroleum Dry Cleaners	EPA-450/3-82-009	Sep 1982	Sources below CTG cutpoints
32	Tanks (Fixed and Floating Roof)	Storage of Petroleum Liquids in Fixed-Roof Tanks	EPA-450/2-77-036	Dec 1977	Sources below CTG cutpoints
33			EPA-450/2-78-047	Dec 1978	Sources below CTG cutpoints
34	Wood Furniture Production	Wood Furniture Manufacturing Operations	EPA-453/R-96-007	Apr 1996	Sources below CTG cutpoints

Table 8: Proposed Negative Declarations					
No.	**CTG Category**	**CTG Title**	**EPA Report Number**	**CTG Date**	**Reason**
35	No Major non-CTG VOC sources				No major VOC sources
36	No Major NO_x sources				No major NO_x sources

The proposed Negative Declaration submittals are exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guideline section 15061(b)(3) under the common sense exemption as the action does not have the potential of causing a direct physical change in the environment and (2) CEQA Guideline sections 15061(b)(2) and 15308 (Cal. Code Regs., tit. 14, §§ 15061(b)(2), 15308)) as authorized actions taken by regulatory agencies for the protection of the environment.

Step 3: For each source category that requires RACT: determine if there are major sources of emissions or non-major sources that are still subject to the applicable CTG, identify all SIP- approved District rules and determine if the rule meets RACT standards if necessary, If there is no rule, then a new District rule that meets RACT must be adopted and promulgated.

As identified above, there are no major sources of emissions that emit or have the potential to emit at least 50 ton per year NOx or VOC in El Dorado County. To determine if the existing District rule reflects RACT, the District assessed each District Rule requirements with any applicable Federal CTG, ACT, Maximum Achievable Control Technology (MACT) and National Emissions Standards Hazardous Air Pollutant (NESHAP) Standards, any applicable CARB Suggested Control Measures or State RACT guidance, and Air Districts Rules and Regulations in our region. The following table identifies District Rules currently in the SIP and any applicable Federal or State RACT. An analysis of each rule follows the table.

Table 9: District Rules Currently in State Implementation Plan				
Rule No.	**District Rule (Adopted date)**	**RACT Guidance: CTG(s), ACT and others**	**District Rule Last Amended Date**	**SIP Approval - FR Citation**
215	Architectural Coatings (9/27/94)	National VOC Emission Standards for Architectural Coatings (40 CFR 59 Subpart D, 63 FR 48848, 09/98), 2007 CARB Suggested Control Measures	6/20/2017	7/18/96 61 FR 37390
224	Cutback and Emulsified Asphalt Paving Materials (9/16/91)	EPA-450/2-77-037 Cutback Asphalt	6/6/94	8/21/95 60 FR 43383
225	Organic Solvent Cleaning and Degreasing Operations (9/27/94)	EPA-453/R-06-001 Industrial Cleaning Solvents	Not Amended	8/21/95 60 FR 43383
235	Surface Preparation and Cleanup (6/27/95)	EPA-450/2-77-022 Solvent Metal Cleaning	Not Amended	4/30/1996 61 FR 18962
229	Industrial, Institutional, and Commercial Boilers, Steam Generators, and	EPA-453/R-93-034 (1993/09) NOx Emissions from Process Heaters, EPA-453/R-94-022 (1994/03)	Not Amended	10/10/01 66 FR 51578

Table 9: District Rules Currently in State Implementation Plan				
Rule No.	**District Rule (Adopted date)**	**RACT Guidance: CTG(s), ACT and others**	**District Rule Last Amended Date**	**SIP Approval - FR Citation**
	Process Heaters(1/23/01)	NOx Emissions from Industrial, Commercial & Institutional Boilers		
230	Automotive Refinishing Operations (9/27/94)	CARB Automotive Refinishing Suggested Control Measure (SCM) (10/05), Sacramento Metropolitan Air Quality Management District (SMAQMD) Rule 459 Automotive, Mobile Equipment, and Associated Parts and Components Coating Operations (8/25/11)	Not Amended	4/30/96 61 FR 18962
231	Graphic Arts Operations (9/27/94)	EPA-453/R-06-002 Offset Lithographic Printing & Letterpress Printing, EPA-453/R-06-003 Flexible Package Printing, EPA-450/2-78-033 Graphic Arts-Rotogravure & Flexography	Not Amended	7/11/97 62 FR 37136
232	Biomass Boilers (9/25/01)	None	Not Amended	10/14/03 68 FR 59121
233	Stationary Internal Combustion Engines (6/11/02)	NOx Emissions from Stationary IC Engines (EPA-453/R-93-032, 07/93), NESHAP Subpart ZZZZ, CARB Determination of RACT and BARCT for Stationary Spark Ignited IC Engines document (11/01), Reciprocating Internal Combustion Engines (RICE) (6/15/04)	6/6/06	9/13/02 67 FR 57960
234	VOC RACT Rule-Sierra Pacific Industries (4/25/95)	None	Not Amended	9/12/95 60 FR 47273
236	Adhesives (7/25/95)	EPA-453/R-08-005 Miscellaneous Industrial Adhesives	Not Amended	7/18/96 61 FR 37390
237	Wood Products Coating (6/27/95)	EPA-453/R-96-007 Wood Furniture Coatings	Not Amended	4/30/96 61 FR 18962
238	Gasoline Transfer and Dispensing (3/27/01)	EPA-450/R-75-102 Stage I Vapor Control Systems, SMAQMD Rule 448 (2/26/09) Gasoline Transfer into Stationary Storage Containers, Placer County APCD (PCAPCD) Rule 213 (2/21/13)	Not Amended	8/27/01 66 FR 44974
239	Natural Gas-fired Residential Water Heaters (3/24/98)	None	Not Amended	3/30/99 64 FR 15129
244	Organic Liquid Loading and Transport Vessels (3/27/01)	EPA-450/2-78-051 Gasoline Tank Trucks EPA-450/2-77-035 Gasoline Bulk Plants	9/25/01	7/8/02 67 FR 45067
245	Valves and Flanges (3/27/01)	None	Not Amended	8/27/01 66 FR 44974

Rule 215 - Architectural Coatings (9/27/94)

Rule 215 – Architectural Coating is an area source rule. There is no applicable CTG and there are no major sources of emissions in this category. Therefore, this rule is not subject to RACT. However, in June 2017, the District amended Rule 215 to incorporate the requirements of CARB's 2007 SCM for Architectural Coatings.

Rule 224 - Cutback and Emulsified Asphalt Paving Material (6/6/94)

This rule prohibits the use of rapid cure cutback asphalt, medium cure cutback asphalt, and low cure cutback asphalt which contains more than 0.5% organic compounds which evaporate at 500F or lower. Also prohibited is emulsified asphalt that contains more than 3% organic compounds that evaporate at 500°F or lower. The CTG as clarified by EPA's "Bluebook" limits solvent content to 7% for all applications or 3-12% depending on application. The rule meets RACT and EPA-450-2-77-037.

Rule 225 - Organic Solvent Cleaning and Degreasing Operations (9/27/94) & Rule 235 Surface Preparation and Cleanup (6/27/95)

The 2006 CTG applies to industries that use organic solvent for cleaning operations such as mixing vessels (tanks), spray booths, and parts cleaners, where a facility emits at least 6.8 kg/day (15 lb/day) of VOC before consideration of controls in an ozone nonattainment area. Cleaning activities include actions such as wiping, flushing, or spraying.

As detailed in Step 2 above, the District reviewed the permit database and emissions inventory and consulted with District inspectors to determine if any industries using cleaning solvents in El Dorado County exceed 15 lb/day VOC emissions. No sources were found to be subject to the 2006 CTG.

Richard Rhoads, Director of the Control Programs Development Division (MD-15) in the EPA's Office of Air Quality Planning and Standards issued a memo dated September 7, 1978 clarifying exemptions to the previous 1977 CTG. The memo states that in jurisdictions with populations less than 200,000 people, sources not exceeding 100 ton per year potential to emit VOCs are not subject to the CTG. Census population of El Dorado County in 2020 is 185,015 people. [12] The District has evaluated all potential sources of solvent cleaning and determined there are none with the potential to emit 100 ton VOC or more annually. The Negative Declaration adopted by the El Dorado County Air Board of Directors on January 3, 2017, and approved by the EPA is still valid. There are no sources in El Dorado County subject to CTG EPA-450/2-77-022. Rule 225 is not subject to RACT.

Rule 229 - Industrial, Institutional, & Commercial Boilers, Steam Generators, & Process Heaters (1/23/01)

This rule applies to boilers, steam generators, and process heaters with rated inputs greater than 5 million BTU/hr used in industrial, institutional, and commercial applications. There is no applicable CTG for this source category. CAA section 183(c) required the EPA to issue technical documents which identify alternative controls for all categories of stationary sources of volatile organic compounds and oxides of nitrogen which emit, or have the potential to emit 25 tons per year or more of such air pollutant. The ACT for process heaters states "Process heaters have been identified as a category with emission sources that emit more than 25 tons of nitrogen oxide (NO_x) per year."[13,14] The District reviewed the permit database and emissions inventory, consulted with District inspectors and compiled the following list of boilers under District permit per this rule.

There are twelve total boilers in El Dorado County that exceed 5 million BTU/hr and are thus subject to Rule 229. However, ten are located in South Lake Tahoe, which is not in the Sacramento Federal Nonattainment Area (SFNA) and not in the Mountain Counties Air Basin. Therefore, they are not subject to RACT. While the Tahoe area in the Lake Tahoe Air Basin is in attainment of the federal ozone standard, it is designated non-attainment transitional for the state

[12] According to 2020 The California Census Office – El Dorado County Hard-to-Count Fact Sheet: https://census.ca.gov/wp-content/uploads/sites/4/2019/06/El-Dorado-County.pdf
[13] EPA-453/R-93-034 (1993/09): NO_x Emissions from Process Heaters
[14] EPA-453/R-94-022 (1994/03): NOx Emissions from Industrial, Commercial & Institutional Boilers

8-hour ozone standard, which is also 70ppb. Thus, Tahoe area sources have been included in the analysis. All boilers subject to Rule 229 are required to source test annually.

If "Actual Throughput" is marked "Not Relevant" in the table below, it means the potential emissions assumed unrestricted 24-hour daily operation and those emissions, combined with all facility-wide emissions, do not exceed the "major source" definition of 50 ton per year.

Table 10: District Permitted Facilities Under Rule 229

Facility	Equipment	Fuel	Permit Maximum	Potential (Permitted) Emissions (ton/yr)	Actual Throughput 2018	Actual Emissions 2018 (ton/yr)
Marshall Hospital	5 million BTU/hr boiler	Propane	6,700 hr/yr	0.18 VOC 1.28 NOx	1,561.4 hrs	0.042 VOC 0.55 NOx
Marshall Hospital	5 million BTU/hr boiler	Propane	6,700 hr/yr	0.18 VOC 1.28 NOx	1,458.0 hrs	0.039 VOC 0.52 NOx
Barton Memorial Hospital (Tahoe)	5.907 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.14 VOC 0.48 NOx	Not relevant	Not relevant
Barton Memorial Hospital (Tahoe)	5.907 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.14 VOC 0.48 NOx	Not relevant	Not relevant
Barton Memorial Hospital (Tahoe)	5.907 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.14 VOC 0.48 NOx	Not relevant	Not relevant
Lake Tahoe Resort Hotel (Tahoe)	7 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.17 VOC 3.01 NOx	Not relevant	Not relevant
Lake Tahoe Resort Hotel (Tahoe)	7 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.17 VOC 3.01 NOx	Not relevant	Not relevant
Marriot Grand Residence (Tahoe)	14.7 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.7 VOC 3.16 NOx	Not relevant	Not relevant
Marriot Grand Residence (Tahoe)	14.7 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.7 VOC 3.16 NOx	Not relevant	Not relevant
Marriot Grand Residence PADMA (Tahoe)	14.7 million BTU/hr boiler	Natural Gas	500 hrs/yr	0.02 VOC 0.36 NOx	400 hrs	0.02 VOC 0.29 NOx
LTUSD South Tahoe High School (Tahoe)	16.738 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.395 VOC 0.745 NOx	Not relevant	Not relevant
LTUSD South Tahoe High School (Tahoe)	16.738 million BTU/hr boiler	Natural Gas	None, assumed 24/7 operation	0.395 VOC 0.745 NOx	Not relevant	Not relevant

Below are the facility-wide emissions of the sources with boilers subject to Rule 229; none of which exceed 50 tpy VOC or NOx emissions:

Table 11: District Permitted Facilities Subject to Rule 229 Potential to Emit Emissions

Facility	Equipment	Facility-wide Potential Emissions (ton/yr)
Marshall Medical	2 boilers >5MMBTU/hr 10 boilers <5MMBTU/hr 4 emergency engines	1.69 VOC 8.44 NOx

Barton Memorial Hospital	3 emergency engines 3 boilers >5MMBTU/hr Multiple boilers <5MMBTU/hr	1.42 VOC 7.7 NOx
Lake Tahoe Resort	1 emergency engine 2 boilers >5MMBTU/hr	0.33 VOC 6.17 NOx
Marriott Grand Residence	1 emergency engine 3 boilers >5MMBTU/hr 1 boiler <5MMBTU/hr	1.6 VOC 7.39 NOx
LTUSD South Tahoe High School	2 boilers >5MMBTU/HR Multiple boilers <5MMBTU/hr	0.866 VOC 2.08 NOx

There are no major sources subject to Rule 229 Industrial, Institutional, and Commercial Boilers, Steam Generators, Process Heaters in El Dorado County; therefore, the rule is not subject to RACT.

Rule 230 - Automotive Refinishing Operations (9/27/94)

Rule 230 applies to automotive refinishing operations (repair) while CTG EPA-450-2-77-008 and EPA 453/R-08-006 apply to coating of new automotive and light-duty trucks in assembly plants. There are no automotive/truck assembly plants in El Dorado County, therefore, no sources are subject to CTG EPA-450-2-77-008 or EPA 453/R-08-006. Additionally, none of the facility-wide emissions from automotive refinishing operations in El Dorado County exceed the major source definition of emitting or having a potential to emit at least 50 ton per year (Table 12). Most of the automotive repair shops have converted their coating lines to water-based coatings which make Rule 230 emission reduction measures to be considered equal to equivalent measures in the regional districts' rules. Nevertheless, the District may adopt CARB's 2005 SCM for Automotive Refinishing as the next rule update.

Table 12: District Permitted Facilities Emissions

Facility	Industry & Process	Potential Total Paint & Solvent VOC Emissions (ton/year)	Actual 2018 Total VOC Emissions (ton/year)
Caliber Collision	Automotive Collision Repair	0.72	0.2
Cameron Park Auto Body	Automotive Collision Repair	0.26	0.2
Cooks Collision	Automotive Collision Repair	2.00	1.06
Frank's Body Shop	Automotive Collision Repair	2.00	0.78
Fulmer's Auto Body	Automotive Collision Repair	0.26	0.14
G & O Body Shop	Automotive Collision Repair	1.00	0.35
Hangtown Body Shop	Automotive Collision Repair	3.00	0.16
Kniesel's Collision Center	Automotive Collision Repair	2.3	0.24
Placerville Body Shop	Automotive Collision Repair	1.00	0.19
Solis Collision Center	Automotive Collision Repair	1.00	0.44
South Side Auto Body (Tahoe)	Automotive Collision Repair	1.00	0.30
Stymeist Auto Body	Automotive Collision Repair	2.00	0.30
Welcome's Auto Body (Tahoe)	Automotive Collision Repair	1.00	0.32

Holden Sheetmetal Restoration	Automotive Collision Repair	0.26	0.1

As shown above, there are no major sources subject to Rule 230 Automotive Refinishing Operations in El Dorado County. Rule 230 is not subject to RACT.

Rule 231 - Graphic Arts Operations (9/27/94)

This rule applies to all graphic arts operations which emit more than 660 pounds of VOC per month (3.96 ton/year). As shown above in the Graphics Arts section of Step 2, Broadridge Customer Communications is the only graphic arts operation under permit with District. Broadridge has actual emissions below the applicability threshold for the 2006 CTG for Lithographic and Letterpress printing. Broadridge has a facility-wide quarterly VOC permit limit for all printing operations and an annual VOC limit of 3.97 ton. Additionally, the facility has an annual NOx emissions limit of 14.22 ton and VOC limit of 12.78 ton which includes the emissions from all printers, engines, boilers/heaters, and furnaces (see discussion in Rule 233 below for more detail). Broadridge does not meet the major source definition of 50 ton per year emissions. There are no major sources subject to Rule 231 Graphic Arts Operations in El Dorado County. Rule 231 is not subject to RACT.

Rule 232 - Biomass Boilers (9/25/01)

This rule applies to boilers and steam generators with rated heat inputs of greater than or equal to 5 million BTU per hour and which have a primary energy source of biomass consisting of a minimum of 75 percent of the total heat input. The District reviewed the permit database and emissions inventory and consulted with district inspectors to determine if there are any sources under permit pursuant to this rule and found none. Likewise, there are no major sources subject to Rule 232 Biomass Boilers in El Dorado County. Rule 232 is not subject to RACT.

Rule 233 - Stationary Internal Combustion Engines (6/6/06)

The District reviewed the permit database and emissions inventory and consulted with District inspectors to determine if there are any stationary internal combustion engines (ICE) in El Dorado County that emit more than 50 tpy NOx. Most of the stationary ICE's in the county are emergency backup power generators and rarely operate. There are two large prime power engines that can run on natural gas or diesel with the greatest potential of reaching "major source" emissions levels. Located at Broadridge Customer Communications in El Dorado Hills, they are both required to perform source testing to ensure the equipment emissions do not exceed 0.15 g/bhp-hr, in addition to a runtime limit of 2,166 hours per quarter.

Table 13: Broadridge Customer Communications Prime Power Engines

Facility	Equipment	Maximum Permit Limit (hrs/yr)	Potential (Permitted) Emissions (ton/yr)	Actual Operation (hr/yr)	Actual Emissions 2018 (ton/yr)
Broadridge Customer Communications Permit to Operate (PO) 13-1297	2,961 bhp Prime Power Natural Gas/Diesel Engine	8,664	4.24 VOC 4.24 NOx	4,314	2.28 VOC 2.28 NOx
Broadridge Customer Communications PO 13-1298	2,961 bhp Prime Power Natural Gas/Diesel Engine	8,664	4.24 VOC 4.24 NOx	4,323	2.27 VOC 2.27 NOx

The Broadridge Customer Communications facility-wide potential emissions do not exceed 25 ton per year VOC or NOx as detailed in Table 14 below:

Table14a: Broadridge Customer Communications Total Emissions (ton/year)			
Facility	**Equipment**	**Potential (Permitted) Emissions (ton/yr)**	**Actual Emissions (ton/yr)**
Broadridge Customer Communications	15 printers	3.97 VOC	3.00 VOC
Broadridge Customer Communications	6 engines (generators, includes PO 13-1297 & PO 13-1298 above (prime power) and 4 emergency backup engines)	8.55 VOC 9.86 NOx	6.72 VOC 5.43 NOx
Broadridge Customer Communications	Heating system comprised of 39 furnaces & boilers	0.26 VOC 4.36 NOx	0.13 VOC 2.18 NOx

Table 14b: Broadridge Customer Communications Total Emissions			
Total VOC Potential to Emit (ton/year)	**Total NOx Potential to Emit (ton/year)**	**Total VOC Actuals (ton/year)**	**Total NOx Actuals (ton/year)**
12.78	14.22	9.85	7.61

El Dorado County's largest stationary source of emissions, Broadridge Customer Communications, does not exceed 25 tpy on a facility-wide basis for VOC or NOx both by potential and actual emissions. Rule 233 is not subject to RACT.

Rule 234 - VOC RACT Rule-Sierra Pacific Industries (4/25/95)

Rule 234 addresses RACT for the County's only (previous) major source: Sierra Pacific Industries (SPI). As noted above, SPI operated a Biomass Boiler and was regulated under SIP-approved District Rules 232 Biomass Boilers (Fed. Reg. Publication Date 10/14/2003) and Rule 234 VOC RACT Rule – Sierra Pacific Industries (Fed. Reg. Publication Date 9/12/1995). Rule 234 requires a VOC limit of 150 ppmv for boilers exceeding the calendar year average of 50,000 lb/hr steam. This was determined by the "RACT Determination for Michigan-California Lumber Company Technical Support Documentation" prepared by Radian for EPA-Region IX in December 1993. The analysis is still appropriate.

SPI ceased operation of the Biomass Boiler in 2009 and dismantled the unit in 2013. There are no Title V or major sources left in El Dorado County or any sources to which Rule 234 would apply. Rule 234 is not subject to RACT.

Rule 236 - Adhesives (7/25/95)

This rule applies to sources which use 10 gallons or more per year of adhesives. The District reviewed the permit database and emissions inventory and consulted with district inspectors and determined there are no sources under permit pursuant to this rule. Likewise, there are no major sources subject to Rule 236 Adhesives in El Dorado County. Rule 236 is not subject to RACT.

Rule 237 - Wood Products Coatings (6/27/95)

This rule applies to sources applying a total of 20 gallons or more per month of coatings, inks, stains, and/or strippers in wood product coating operations for the manufacture of wood products, including furniture and other coated objects made of solid wood and/or wood composition, and/or

simulated wood material. The District reviewed the permit database and emissions inventory and consulted with District inspectors to determine wood coating sources in El Dorado County. Table 15 contains permitted and exempt wood coating companies operating within El Dorado County with the 2018 actual VOC emissions data:

Table 15: 2018 actual VOC emissions data

Facility	Industry or Process	Potential (Permitted) Emissions	Actual Emissions
Burleson Antiques	Furniture Refinishing	No permit. VOC emissions <2 lb/day[15]	<2 lb/day
Cook Custom Cabinets	Cabinet Making/Refinishing	2 ton/year	2,200 lb/yr
Impact Photographics	Wood Display Case Making/Coating	1.5 ton/year	400 lb/yr
Redline Restoration	Furniture Refinishing	1 ton/year	1,460 lb/yr
Rich & Mike's Cabinets	Cabinet Making/Refinishing	No permit. VOC emissions <2 lb/day	<2 lb/day
The Door Stop	Door & Window Coating	No permit. VOC emissions <2 lb/day	<2 lb/day

As indicated above, there are no sources with the potential to emit 25 ton/year or more VOC. Similarly, there are no facilities that exceed the threshold of 25 ton/year for the CTG for Wood Furniture Manufacturing Operations (EPA-453/R-96-007). There are no major sources in El Dorado County subject to Rule 237 Wood Products Coatings. Rule 237 is not subject to RACT.

Rule 238 - Gasoline Transfer & Dispensing (3/27/01)

This covers gasoline transfer into stationary storage tanks and mobile fuelers (Phase I) and gasoline transfer into vehicle fuel tanks (Phase II). EPA approved it into the SIP on August 27, 2001 ,(66 FR 44974). This rule meets CARB Phase I Enhanced Vapor Recovery requirements and is consistent with other district rules in the region, such as Sacramento Metropolitan Air Quality Management District (SMAQMD) Rule 448 (2/26/09) Gasoline Transfer into Stationary Storage Containers and Placer County APCD (PCAPCD) Rule 213 (2/21/13) Gasoline Transfer Into Stationary Storage Containers.

Rule 238 is consistent with SMAQMD Rule 449 Transfer of Gasoline into Vehicle Fuel Tanks and PCAPCD Rule 214 and their emissions efficiency requirements. Rule 238 does not contain the various exemptions for emergency motor vehicles, low use maintenance inspections, E85 dispensing, and ORVR that are included in SMAQMD Rule 449. Therefore, Rule 238 Gasoline Transfer and Dispensing meets RACT.

Rule 239 - Natural Gas-Fired Residential Water Heaters (3/24/98)

This rule applies to natural gas-fired residential water heaters with a rated input capacity less than 75,000 Btu/hr. Water heaters used in recreational vehicles, swimming pools, and spas or that use any other fuel are exempt from this rule. There are no major sources in El Dorado County subject to this rule. Since the rule is limited to natural gas-fired water heaters less than 75,000 btu/hr, using AP-42 emissions factors, the following table was compiled to estimate the number of 75,000 btu/hr water heaters a facility would need to emit 25 ton per year NOx to be considered a major source.

[15] District Rule 501 General Permit Requirements (June 6, 2006) Section 501.1.N allows equipment that emits less than 2 pounds of any pollutant in any 24 hour period to be exempted from permitting requirements.

Table 16: Emissions from One 75,000 Btu/hr Heater Operating Full On 24 hours/day for 1 year						
Capacity (Btu/hr)	Operating Hours	Fuel Burned (mmcf/yr)	Emission Factor (lb/mmcf)		Potential Emissions (ton per year)	
			NOx	VOC	NOx	VOC
0.075	8,760	0.64	94	5.5	0.03	0.002

A facility would need to have 25/0.03 = 826 natural gas fired residential water heaters operating at full power every hour for one year to emit 25 ton NOx. There are no facilities of this size in El Dorado County nor are there any facilities that have residential natural-gas fired water heaters that when added to all other emission sources at a facility, that emit more than 25 tpy. Natural gas service is limited to the El Dorado Hills and South Lake Tahoe areas in El Dorado County. Rule 239 is not subject to RACT.

Rule 244 - Organic Liquid Loading and Transport Vessels (9/25/01)

This rule requires a CARB certified or District approved vapor recovery/disposal system which has a recovery efficiency of 99% or 0.08 lb of non-methane vapor emitted per 1,000 gallons transferred. Additionally, Rule 244 requires that the transport vessels have a valid certification of vapor integrity pursuant to California Health and Safety Code 41962(g). The Gasoline Tank Trucks CTG applies to submerged filling and vapor balance system. The District compared this rule to similar rules from the Bay Area AQMD, San Joaquin Unified APCD, South Coast AQMD, and Ventura County APCD and determined those rules did not contain more stringent requirements than Rule 244 with one exception. The exception is that the BAAQMD emission standards for gasoline loading at bulk terminals (0.04 lb/1,000 gal) is lower that the District standards (0.08 lb/1,000 gal). However, as determined above, there are no bulk terminals in El Dorado County. This rule meets RACT and CTG EPA-450-2-78-051.

As indicated in Table 1, there are no “bulk terminals” (facilities that receive and store petroleum products by pipeline or facilities with >20,000 gallons/day throughput) in El Dorado County. There are no sources subject to CTG EPA-450-2-77-026.

The CTG for gasoline bulk plants applies to those facilities with less than 20,000 gallons/day throughput. There are only three “bulk plants” (facilities with <20,000 gallons/day throughput) within El Dorado County; one located in Placerville, Diamond Springs, and South Lake Tahoe. These bulk plants are all associated with cardlock gas dispensing facilities. The cardlock portions, while not subject to the CTG, are shown to provide a facility-wide emissions amount. All sources are CARB certified with Phase I and Phase II vapor recovery and required to be compliant with District Rule 238 Gasoline Dispensing Facilities.

Table 17: District Bulk Facilities Emissions								
Facility	Process	CARB Cert	Maximum Permit Throughput (gal/yr)	Potential Emissions (lb/yr)	Actual Throughput		Actual Emissions*	
					2017 (gal/yr)	2018 (gal/yr)	2017 (lb/yr)	2018 (lb/yr)
Hunt & Sons Placerville	Bulk tank loading & truck loading	G-70-102	2,000,000	1,892	492,263.00 (1,348.6 gal/day)	559,674.00 (1,533.0 gal/day)	465.68	529.45
	Card Lock Fuel Dispensing	G-70-164	1,000,000	1,520	507,107.00 (1,389.3 gal/day)	472,770.00 (1,295 gal/day)	770.90	718.61
Flyers Energy	Bulk tank loading &	G-70-124	1,500,000	1,419	611,258.00 (1,674.7	15,981.00 (43.8 gal/day)	578.25	15.12

#751 (Tahoe)	truck loading				gal/day)			
	Card Lock Fuel Dispensing	G-70-175 G-70-199	750,000	1,140	260,757.00 (728.1 gal/day)	18,235.00 (49.9 gal/day)	396.35	27.72
Dawson Oil Cardlock	Bulk tank loading & truck loading	VR-102	250,000	146	84,135.00 (230.5 gal/day)	86,560.00 (237.2 gal/day)	48.97	50.38
	Card Lock Fuel Dispensing	G-70-52 G-70-199	1,975,000	2,508	663,364.00 (1,817.4 gal/day)	608,504.00 (1,667.1 gal/day)	842.47	772.80

* Discrepancy in emissions is due to different emission factors used for Scenario 3B and 6B of CAPCOA's *Gasoline Service Station Industrywide Risk Assessment Guidelines (Nov 1997).*

EPA's "Blue Book" (and reasserted in the model VOC rule (pg. 122) for bulk plants) indicates that bulk plants with an average daily throughput of gasoline less than 4,000 gallons per day on a 30-day rolling average are only subject to the requirement for submerged fill, observation for vapor/liquid leaks, and maintaining records.[16] In the last two years none of the District bulk facilities exceeded 4,000 gal/day on a 30-day rolling average threshold. However; since Hunt & Sons Bulk Plant had recorded 5,128 gal/day in 2015, Rule 244 is still subject to RACT and CTG EPA-450-2-77-035.

The CTG applies to submerged filling and vapor balance system. Rule 244 requires a CARB certified or District approved vapor recovery/disposal system which has a recovery efficiency of 99% or 0.08 lb of non-methane vapor emitted per 1,000 gallons transferred. All three sources are CARB certified. Rule 244 meets RACT and is consistent with CTG EPA-450-2-77-035.

Rule 245 - Valves and Flanges (3/27/01)

Rule 245 is an area source rule for which there is no CTG. It applies to all valves and flanges in reactive organic compound service. There are no major sources in El Dorado County. Rule 245 is not subject to RACT.

Step 4: Identify District actions required based on the RACT analysis.

RACT Findings

Negative Declarations can be adopted for the CTGs listed in Appendix Table A. This is based on staff review of District sources and verification that the District does not have sources meeting the applicability criteria for the CTGs identified in Appendix Table A. In addition, the Staff analysis found there were no major stationary sources of VOC or NOx, and no non-CTG major sources, for which District rules satisfying RACT had not been adopted. Finally, staff finds that all other District SIP-approved rules either continue to meet current RACT or are not subject to RACT requirements.

Staff recommends that the District Board make the declaration that no existing Stationary Sources subject to a CTG for VOC exist in El Dorado County in the specified CTG source categories in Appendix A, that the District has no major non-CTG Sources of VOC or NOx, and that the remaining District rules that are subject to RACT are implementing current RACT levels of control. Staff further recommends that these RACT SIP submittals be found exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines section 15061(b)(3) under the common sense exemption as the action does not have the potential of causing a direct physical change in the environment and section 15308 as actions taken by regulatory agencies

[16] Both the EPA Blue Book (pg. 2-18) and Model VOC Rules for RACT (pg. 122) state that any facility that exceeds the applicability threshold will remain subject to the CTG even if its throughput or emissions later falls below the applicability threshold. https://archive.epa.gov/ttn/ozone/web/pdf/voc_modelrules.pdf

as authorized by state law to assure the maintenance, restoration, or enhancement of the environment where the regulatory process involves procedures for the protection of the environment.

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Appendix A

List of 2015 RACT SIP Proposed Negative Declarations

Table A: List of 2015 RACT SIP Proposed Negative Declarations			
No.	**CTG Reference No.**	**CTG Title**	**District Status**
1	EPA-450/2-77-008	Surface Coating of Cans, Coils, Paper, and Fabric	No Sources of Can, Coil, Paper or Fabric coatings
2	EPA-450/2-77-008	Surface Coating of Automobiles and Light-Duty Trucks	No Sources of new automotive and light-duty trucks in assembly plants
3	EPA-450/2-77-022	Solvent Metal Cleaning	Sources Below CTG Cutoff points
4	EPA-450/2-77-025	Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds	No Sources
5	EPA-450/2-77-026	Tank Truck Gasoline Loading Terminals	No Sources
6	EPA-450/2-77-032	Surface Coating of Metal Furniture	No Sources
7	EPA-450/2-77-033	Surface Coating of Insulation of Magnet Wire	No Sources
8	EPA-450/2-77-034	Surface Coating of Large Appliances	No Sources
9	EPA-450/2-77-036	Storage of Petroleum Liquids in Fixed-Roof Tanks	Sources Below CTG Cutoff points
10	EPA-450/2-78-015	Surface Coating of Miscellaneous Metal Parts and Products	Sources Below CTG Cutoff points
11	EPA-450/2-78-029	Manufacture of Synthesized Pharmaceutical Products	No Sources
12	EPA-450/2-78-030	Manufacture of Pneumatic Rubber Tires	No Sources
13	EPA-450/2-78-032	Factory Surface Coating of Flat Wood Paneling	No Sources
14	EPA-450/2-78-033	Graphic Arts-Rotogravure and Flexography	Sources Below CTG Cutoff points
15	EPA-450/2-78-036	Leaks from Petroleum Refinery Equipment	No Sources
16	EPA-450/2-78-047	Petroleum Liquid Storage in External Floating Roof Tanks	Sources Below CTG Cutoff points
17	EPA-450/3-82-009	Large Petroleum Dry Cleaners	Sources Below CTG Cutoff points

18	EPA-450/3-83-006	Leaks from Synthetic Organic Chemical Polymer and Resin Manufacturing Equipment	No Sources
19	EPA-450/3-83-007	Leaks from Natural Gas/Gasoline Processing Plants	No Sources
20	EPA-450/3-83-008	Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins	No Sources
21	EPA-450/3-84-015	Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry	No Sources
22	EPA-450/4-91-031	Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry	No Sources
23	EPA-453/R-96-007	Wood Furniture Manufacturing Operations	Sources Below CTG Cutoff points
24	EPA-453/R-94-032 61 FR 44050; 8/27/96	ACT Surface Coating at Shipbuilding and Ship Repair Facilities Shipbuilding and Ship Repair Operations (Surface Coating)	No Sources
25	EPA-453/R-97-004 59 FR 29216; 6/06/94	Aerospace MACT and Aerospace (CTG & MACT)	No Sources
26	EPA-453/R-06-001	Industrial Cleaning Solvents	Sources Below CTG Cutoff points
27	EPA-453/R-06-002	Offset Lithographic Printing and Letterpress Printing	Sources Below CTG Cutoff points
28	EPA-453/R-06-003	Flexible Package Printing	Sources Below CTG Cutoff points
29	EPA-453/R-06-004	Flat Wood Paneling Coatings	No Sources
30	EPA 453/R-07-003	Paper, Film, and Foil Coatings	No Sources
31	EPA 453/R-07-004	Large Appliance Coatings	No Sources
32	EPA 453/R-07-005	Metal Furniture Coatings	No Sources
33	EPA 453/R-08-003	Miscellaneous Metal Parts Coatings Table 2 – Metal Parts and Products	Sources Below CTG Cutoff points
34	EPA 453/R-08-003	Miscellaneous Plastic Parts Coatings Table 3 – Plastic Parts and Products	Sources Below CTG Cutoff points
35	EPA 453/R-08-003	Miscellaneous Plastic Parts Coatings Table 4 – Automotive/Transportation and Business Machine Plastic Parts	Sources Below CTG Cutoff points
36	EPA 453/R-08-003	Miscellaneous Plastic Parts Coatings Table 5 – Pleasure Craft Surface Coating	Sources Below CTG Cutoff points

37	EPA 453/R-08-003	Miscellaneous Plastic Parts Coatings Table 6 – Motor Vehicle Materials	Sources Below CTG Cutoff points
39	EPA 453/R-08-004	Fiberglass Boat Manufacturing Materials	No Sources
39	EPA 453/R-08-005	Miscellaneous Industrial Adhesives	Sources Below CTG Cutoff points
40	EPA 453/R-08-006	Automobile and Light-Duty Truck Assembly Coatings	No Sources
41	EPA 453/B16-001	Oil and Natural Gas Industry	No Sources
42	No major non-CTG VOC sources		No Sources
43	No major NO_x sources		No sources