

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

DRAFT NEGATIVE DECLARATION

EPA CTG FOR CONTROL OF VOLATILE ORGANIC EMISSIONS FROM MANUFACTURE OF PNEUMATIC RUBBER TIRES

September 7, 2010

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I. SUMMARY

The federal *Clean Air Act* (CAA) requires certain sources in ozone non-attainment areas to implement control methods called *reasonably available control technology* (RACT). EPA defines RACT as the lowest emission limitation that a particular source is capable of meeting by the application of control technology (i.e., devices, systems, process modification, or other apparatus or techniques that reduce air pollution) that is reasonably available considering technological and economic feasibility.

The RACT requirement is meant to ensure that all moderate and above nonattainment areas, have in place RACT for all source categories covered by a *Control Techniques Guideline* (CTG) document and for major sources that are not subject to a CTG. The San Joaquin Valley Air Basin (Valley) has been classified by the United States Environmental Protection Agency (EPA) as an extreme nonattainment area for the federal 8-hour ozone standard.

District Rule 4681 (Rubber Tire Manufacturing) is subject to RACT requirements of the CTG for Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires (EPA-450/2-78-030). However, there are no stationary sources or emitting facilities subject to the CTG in the Valley. The District also does not anticipate these sources in the future and any new facilities would be subject to the Best Available Control Technology (BACT) under District Rule 2201 (New and Modified Stationary Source Review Rule). BACT is at least as stringent as RACT and can exceed RACT by a significant amount.

If there are no sources within District boundaries that are covered by a CTG, the District Governing Board has two options. The first option is to create or amend, and implement, a RACT rule for the source category, even though there would be no source subject to the rule. The second option would be for the District Governing Board to declare that there are no sources in the Valley subject to a RACT requirement, and then

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the requirement to adopt a rule for those sources is no longer applicable. Staff recommends the later option.

II. DISCUSSION

Sections 182(b)(2) and 182(f) of the CAA requires the San Joaquin Valley Unified Air Pollution Control District (District) to submit a revision to the State Implementation Plan to implement RACT for each category of *volatile organic compound* (VOC) sources covered by a CTG document and for any major stationary source not covered by a CTG document. Alternatively, areas may adopt a negative declaration document that the District has no stationary sources or emitting facilities subject to the EPA CTG documents.

States and Air Districts shall submit negative declarations for those source categories for which they are not adopting CTG-based regulations regardless of whether such negative declarations were made for an earlier SIP. This is necessary since there may now be sources in the nonattainment area that previously did not exist, or in areas where the boundaries of the nonattainment area have expanded, there may be sources in the new portion of the nonattainment area which should not be overlooked.

The negative declaration must go through the same public review requirements as any other SIP submittal.

III. RECOMMENDED ACTION

The District has reviewed its permit files and the emission inventory for its federal Clean Air Plan, and has determined that there are no stationary sources or emitting facilities for the following CTG category. The District also does not anticipate these sources in the future.

GUIDANCE DOCUMENT TITLE	DOCUMENT TYPE	DOCUMENT NUMBER
Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires	CTG	EPA-450/2-78-030

District staff recommends that the District Governing Board approve a negative declaration for the CTG for the Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires.

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IV. ENVIRONMENTAL IMPACTS

There are no facilities within the boundaries of the San Joaquin Valley Unified Air Pollution Control District that will be affected by the CTG. The negative declaration for this CTG will not result in new or revised District regulations. Therefore, adoption of this proposed negative declaration is not a project as described in Section 15378(a) of the CEQA guidelines.

V. COST EFFECTIVENESS ANALYSIS, SOCIOECONOMIC IMPACT ANALYSIS, AND RULE CONSISTENCY ANALYSIS

The negative declaration for CTG source categories with no emission sources within District boundaries will not result in new or revised District regulations. Therefore, cost effectiveness analysis, socioeconomic impact analysis, and rule consistency analysis are not required for this project.

VI. REFERENCES

2009 RACT SIP Analysis

CEQA Guidelines

Clean Air Act

Control Techniques Guidelines for the Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires (EPA-450/2-78-030).

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