



70 ppb Ozone Standard Implementation Evaluation
(70 ppb O₃ Evaluation):
RACT SIP Analysis;
Federal Negative Declarations; and
Emission Statement Certification

May 19, 2020

**Antelope Valley Air Quality
Management District**

43301 Division Street, Suite 206
Lancaster, CA 93535
(661) 723-8070

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Executive Summary

Effective October 26, 2015 (80 FR 65292), the United States Environmental Protection Agency (USEPA) lowered the primary ozone National Ambient Air Quality Standard (NAAQS) from 0.075 parts per million (ppm) to 0.070 ppm (or, 70 parts per billion (ppb) for ease of reference). The Federal Clean Air Act (FCAA) requires newly designated ozone non-attainment areas to implement Reasonably Available Control Technology (RACT) on certain sources, including all major sources of ozone precursors. For the purposes of the FCAA, portions of the District have been designated non-attainment for ozone. The Antelope Valley Air Quality Management District (AVAQMD) has evaluated its adopted rules and all of its major sources of ozone precursors to ensure that current rules satisfy RACT.

The FCAA also requires areas designated non-attainment and classified moderate and above to implement RACT for sources subject to Control Techniques Guidelines (CTG) documents issued by the United States Environmental Protection Agency (USEPA) for “major sources” of volatile organic compounds (VOCs) and oxides of nitrogen (NO_x) which are ozone precursors. For those CTG source categories not represented within the area designated non-attainment for ozone, USEPA requires the submission of a Federal Negative Declaration certifying that those sources are not present. The AVAQMD has examined the list of CTGs to determine which do not have corresponding sources within the jurisdiction of the District (major or minor) that meet the CTG applicability threshold, and is updating existing Federal Negative Declarations (FND) and adopting one new FND applicable to the 2008 and 2015 standards for Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings: Miscellaneous Plastic Parts Coatings Table 4 - Automotive/Transportation and Business Machine Plastic Parts.

Additionally, the District must provide certification of their emission reporting program for VOC and NO_x sources. The District has evaluated and is certifying existing State Implementation Plan (SIP)-approved Rule 107 – *Certification of Submissions and Emission Statements* as meeting this requirement.

This document represents a current and complete 70 ppb Ozone Standard Implementation Evaluation (70 ppb O₃ Evaluation): RACT SIP Analysis; FNDs; and, Emission Statement Certification to satisfy the District’s obligation for the 2015 ozone standard.

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CHAPTER 1 - Introduction and Background

Purpose

Regulatory History

Federal Legal Requirements

Pollutant Descriptions

Setting

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INTRODUCTION

Purpose

The FCAA requires that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors. This document: (1) reviews all available instances of RACT for applicability to the AVAQMD; (2) reviews all AVAQMD major sources for RACT applicability; and (3) identifies any actions the AVAQMD must take to address applicable RACT requirements. This document satisfies 42 U.S.C. §§7511a (FCAA §182) regarding RACT requirements for the 2015 ozone NAAQS.

BACKGROUND

Regulatory History

The USEPA designated the northern desert part of Los Angeles County as nonattainment and classified it as Severe for the 2015 8-hour standard. This area was classified based on an ozone design value calculated from 2008 through 2010 concentrations in the region. The Severe classification requires attainment of the 8-hour ozone NAAQS by July 2027, fifteen years after the date of designation. The desert portion of Los Angeles County was established as its own air district as of July 1, 1997, the Antelope Valley Air Pollution Control District (AVAPCD), pursuant to former Health & Safety Code (H&SC) §40106 (Statutes 1996 ch 542, Repealed Statutes 2001 ch. 163). This air district was replaced by the AVAQMD on January 1, 2002, pursuant to H&SC §41300 et seq (Statutes 2001 ch. 163). As a successor district to the SCAQMD, the AVAQMD assumes the authorities and duties of the SCAQMD for the Antelope Valley (H&SC §41302).

Ozone plans have been adopted by the AVAQMD to address federal ozone planning requirements, including RACT applicability. This document updates the Federal RACT portion of all previously submitted plans.

Federal Legal Requirements

Sections 182(b)(2) and 182(f) of the FCAA require that ozone non-attainment areas implement RACT for sources that are subject to CTGs and for major sources of ozone precursors (42 U.S.C. §7511a). Ozone non-attainment areas classified moderate and higher for the 2015 ozone NAAQS must submit a RACT SIP analysis by August 3, 2020 (40 CFR 51.1312).

Pollutant Description and Health Effects

Ozone (O₃) - A colorless gas that is a highly reactive form of oxygen. It has a strong odor when highly concentrated. Ozone can occur naturally but can also be formed from other compounds through photochemistry, a complex system of reactions with hydrocarbons and oxides of nitrogen in the presence of sunlight (ultraviolet). The Mojave Desert Air Basin experiences ozone concentrations in excess of the State and Federal Ambient Air Quality Standards.

Ozone can cause respiratory irritation and discomfort, making breathing more difficult during exercise. Ozone can reduce the respiratory system's ability to remove inhaled particles, increase pulse rate, decrease blood pressure and reduce the body's ability to fight infection. After six hours of exposure a healthy person can have significant reduction of lung function. It is an

irritant of the skin, eyes, upper respiratory system, and mucous membranes, although symptoms disappear after exposure. It may also be a carcinogen.

Setting

The Antelope Valley is the desert portion of Los Angeles County. The AVAQMD has been designated non-attainment for the 2015 8-hour ozone NAAQS by USEPA as a portion of the Western Mojave Desert non-attainment area in 40 CFR 81.305. The ozone design value classifies the area as a Severe nonattainment area with 2027 as the required attainment year (42 U.S.C. 7511(a)(2); FCAA §181(a)(2)). The nonattainment area includes the entirety of the AVAQMD.

The Antelope Valley covers 1300 square miles and included 219,628 persons as of the 1990 census (approximately 366,000 in 2015), centered within the cities of Lancaster and Palmdale. The region is characterized by a wide, arid valley little precipitation. Air Force Plant 42 and a portion of Edwards Air Force Base are located in the area.

The primary roadways in the Antelope Valley are State Route 14 and State Route 138. Both of these arterials carry a substantial amount of daily commute traffic from the region into the Greater Los Angeles Basin.

The Antelope Valley is primarily a bedroom community, but does have significant aerospace development and manufacturing on Plant 42 (Boeing, Lockheed Martin and Northrop Grumman all lease facilities on the base from the Air Force).

CHAPTER 2 – RACT SIP Evaluation

Process

CTG Sources

Major Non-CTG Sources

Major Source Table

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Process

The AVAQMD reviewed a USEPA-provided list of source categories and applicable CTGs that collectively define RACT. The AVAQMD reviewed this list for local applicability, and the results are presented in Appendix “A.”

CTG Sources

Those categories of sources covered by a published CTG are referred to as CTG sources. For each CTG source category, the AVAQMD has identified whether or not a current source is sited within its jurisdiction, or whether it is likely a source may be sited within its jurisdiction. In most cases, where the AVAQMD has no source that meets the category, the AVAQMD will file a FND for that category. For some categories the AVAQMD has an adopted rule that applies to the category that has been deemed to meet the applicable RACT for that category. In one case, the AVAQMD has a rule which has been evaluated and may need to be updated for RACT, and the AVAQMD is accordingly committing to further evaluate the rule for current RACT for this source category. Chapter 3 details AVAQMD actions identified by this evaluation process.

Major Non-CTG Sources

RACT is also required for all major sources of ozone precursors within the jurisdiction of the AVAQMD. For severe non-attainment areas, a major source is defined as any stationary source or group of sources that emits, or has the potential to emit, at least 25 tons per year of VOCs or NO_x (FCAA 182(d) and (f)). Table 1 below presents a list of all facilities with Title V Federal Operating Permits within the AVAQMD, whether the facility is a major source of ozone precursors, and the current RACT applicable to those sources. There are no additional rules identified for major sources that require amendment to Federal RACT.

Table 1 - Major Source Table

Source/ Federal Operating Permit	Major Source: NO_x/VOC	Description	Applicable CTG/RACT	Applicable District Rule(s)
Lockheed Martin	NO _x VOC	Aerospace	Control of VOC Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations CTG & MACT (See 59 FR 29216, 6/6/1994); CTG (Final), (EPA453/R-97-004, 12/97).	1124, 1146
Northrop Grumman	NO _x VOC	Aerospace	Control of VOC Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations CTG & MACT (See 59 FR 29216, 6/6/1994); CTG (Final), (EPA453/R-97-004, 12/97).	1124, 1146
Antelope Valley Recycling & Disposal	N/A	Municipal landfill with landfill gas control system	No applicable CTG. 40 CFR 64 Subpart WWW requires Title V Permit, not a major source.	
Lancaster Landfill	N/A	Municipal landfill with landfill gas control system	No applicable CTG. 40 CFR 64 Subpart WWW requires Title V Permit, not a major source	

CHAPTER 3 – AVAQMD RACT Analysis

2020 RACT Rule Analysis
Federal Negative Declarations

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2020 RACT Rule Analysis

The AVAQMD identified certain rules for RACT analysis. A complete list is contained in Appendix A. The following rules have been identified as requiring additional analysis and potential amendment:

Rule 1113 – Architectural Coatings

Rule 1113 - *Architectural Coatings* was most recently amended June 18, 2013. This rule was approved in to the SIP (80 FR 76222, December 08, 2015). In the 2015 rule evaluation USEPA indicated that the district has no obligation to satisfy RACT. USEPA evaluated the rule for RACT-level controls as well as against EPA's National Volatile Organic Compound Emission Standard for Architectural Coatings (40 CFR Part 59 Subpart D), and CARB's SCM for Architectural Coatings, which is the basis for most of the most stringent architectural coating requirements in California. In 2019 CARB updated the Suggested Control Measure for Architectural Coatings. The District will evaluate Rule 1113 for possible amendment to incorporate the provisions of the 2019 SCM. Upon next amendment, USEPA recommendations will be incorporated.

Rule 1124 – Aerospace Assembly and Component Manufacturing Operations

Rule 1124 – *Aerospace Assembly and Component Manufacturing Operations* was most recently amended 11/19/2013. This rule was approved in to the SIP (80 FR 60040, October 05, 2015) and determined to fulfill RACT. The District has examined similar rules for Districts with similar or more severe attainment status and has determined that some have been amended subsequent to the most recent amendment of AVAQMD Rule 1124 and therefore may require further analysis. The TSD issued for Rule 1124 in October of 2015 identified no deficiencies sufficient for EPA to proposed less than full approval at that time, but several items were recommended for consideration for the next rule revision. The District will evaluate these recommendations and review MDAQMD and SJVAPCD rule limits to determine if they affect current RACT. Rule 1124 may be amended to incorporate those provisions.

Federal Negative Declarations

Current AVAQMD review has identified many source categories that do not have corresponding sources (major or minor) within the jurisdiction of the AVAQMD. The District reviewed its permit files and the emission inventory for its Federal Clean Air Plan, and conducted SIC Code searches, the internet, yellow pages, and District inspectors and engineer's knowledge, and has determined that there are no stationary sources or emitting facilities for the following CTG categories. The District also does not anticipate these sources in the future. For these source categories the AVAQMD is filing FNDs. In some cases, the FND is an update of an earlier FND. In every case, the District has reviewed CTG source categories for applicability within the entire nonattainment area under the jurisdiction of the AVAQMD. FND actions are summarized in Table 2 below.

Table 2 - Federal Negative Declarations

CTG	Source Category	Previously Adopted FNDs: 8-Hour Ozone Standard (84 ppb); 8-Hour Ozone Standard (75 ppb)	Current 2015 Ozone Standard (70 ppb)
Control of Volatile Organic Emissions from Existing Stationary Sources - Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks EPA-450/2-77-008, 1977/05	Cans	12/20/2016	Readopt
	Coils	07/21/2015	Readopt
Control of Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds EPA-450/2-77-025, 1977/10	Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds	09/19/2006; 07/21/2015	Readopt
Control of Hydrocarbons from Tank Truck Gasoline Loading Terminals EPA-450/2-77-026, 1977/10	Tank Truck Gasoline Loading Terminals	09/19/2006; 12/20/2016	Readopt
Control of Volatile Organic Emissions from Existing Stationary Sources - Volume III: Surface Coating of Metal Furniture EPA-450/2-77-032, 1977/12	Coating of Metal Furniture	N/A; 12/20/2016	Readopt

CTG	Source Category	Previously Adopted FNDs: 8-Hour Ozone Standard (84 ppb); 8-Hour Ozone Standard (75 ppb)	Current 2015 Ozone Standard (70 ppb)
Control of Volatile Organic Emissions from Existing Stationary Sources - Volume IV: Surface Coating of Insulation of Magnet Wire EPA-450/2-77-033 1977/12	Insulation of magnet wire from wire coating ovens.	09/19/2006; 07/21/2015	Readopt
Control of Volatile Organic Emissions from Existing Stationary Sources - Volume V: Surface Coating of Large Appliances EPA-450/2-77-034 1977/12	Surface coating of large appliances	09/19/2006; 07/21/2015	Readopt
Control of Volatile Organic Emissions from Bulk Gasoline Plants EPA-450/2-77-035 1977/12	Bulk Gasoline Plants	09/19/2006; 07/21/2015	Readopt
Control of Volatile Organic Emissions from Storage of Petroleum Liquids in Fixed-Roof Tanks EPA-450/2-77-036	Storage of Petroleum Liquids in Fixed-Roof Tanks	10/19/2010; 07/21/2015	Readopt
Control of Volatile Organic Emissions from Manufacture of Synthesized Pharmaceutical Products EPA-450/2-78-029 1978/12	Chemical synthesis; Fermentation; Extraction; Formulation and Packaging.	09/19/2006; 07/21/2015	Readopt
Control of Volatile Organic Emissions from Manufacture of Pneumatic Rubber Tires EPA-450/2-78-030 1978/12	Manufacture of Pneumatic Rubber Tires	09/19/2006; 07/21/2015	Readopt

CTG	Source Category	Previously Adopted FNDs: 8-Hour Ozone Standard (84 ppb); 8-Hour Ozone Standard (75 ppb)	Current 2015 Ozone Standard (70 ppb)
Control of Volatile Organic Emissions from Existing Stationary Sources - Volume VII: Factory Surface Coating of Flat Wood Paneling EPA-450/2-78-032 1978/06	Factory Surface Coating of Flat Wood Paneling	N/A; 12/20/2016	Readopt
Control of Volatile Organic Compound Leaks from Petroleum Refinery Equipment EPA-450/2-78-036 1978/06	Leaks from Petroleum Refinery Equipment	09/19/2006; 07/21/2015	Readopt
Control of Volatile Organic Emissions from Petroleum Liquid Storage in External Floating Roof Tanks EPA-450/2-78-047 1978/12	Petroleum Liquid Storage in External Floating Roof Tanks	10/19/2010; 07/21/2015	Readopt
Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems EPA-450/2-78-051 1978/12	Leaks from Gasoline Tank Trucks and Vapor Collection Systems	10/19/2010; 07/21/2015	Readopt
Control of Volatile Organic Compound Emissions from Large Petroleum Dry Cleaners EPA-450/3-82-009 1982/09	Large petroleum dry cleaners	07/21/2015	Readopt
Control of Volatile Organic Compound Leaks from Synthetic Organic Chemical and Polymer Manufacturing Equipment EPA-450/3-83-006 1984/03	Leaks from Synthetic Organic Chemical and Polymer Manufacturing Equipment	09/19/2006; 07/21/2015	Readopt

CTG	Source Category	Previously Adopted FNDs: 8-Hour Ozone Standard (84 ppb); 8-Hour Ozone Standard (75 ppb)	Current 2015 Ozone Standard (70 ppb)
Control of Volatile Organic Compound Equipment Leaks from Natural Gas/Gasoline Processing Plants EPA-450/3-83-007 1983/12	Leaks from Natural Gas/Gasoline Processing Plants	09/19/2006; 07/21/2015	Readopt
Control of Volatile Organic Compound Emissions from Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins EPA-450/3-83-008 1983/11	Manufacture of high-density polyethylene, polypropylene and polystyrene resins.	09/19/2006; 07/21/2015	Readopt
Control of Volatile Organic Compound Emissions from Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry EPA-450/3-84-015 1984/12	Air Oxidation Processes in Synthetic Organic in synthetic Organic Chemical Manufacturing Industry	09/19/2006; 07/21/2015	Readopt
Control of Volatile Organic Compound Emissions from Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry EPA-450/4-91-031 1993/08	Reactor Processes and Distillation Operations in Synthetic Organic Chemical Manufacturing Industry	09/19/2006; 07/21/2015	Readopt
Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations EPA-453/R-96-007 1996/04	Wood Manufacturing Operations	09/19/2006; 07/21/2015	Readopt
Alternative Control Techniques Document: Surface Coating Operations at Shipbuilding and Ship Repair Facilities EPA 453/R-94-032 1994/04 61 FR 44050; 08/27/1996	ACT Surface Coating at Shipbuilding and Ship Repair Facilities Shipbuilding and Ship Repair Operations (Surface Coating)	10/19/2010; 07/21/2015	Readopt

CTG	Source Category	Previously Adopted FNDs: 8-Hour Ozone Standard (84 ppb); 8-Hour Ozone Standard (75 ppb)	Current 2015 Ozone Standard (70 ppb)
Control Techniques Guidelines for Flat Wood Paneling Coatings EPA-453/R-06-004 2006/09	Flat Wood Paneling Coatings	N/A; 12/20/2016	Readopt
Control Techniques Guidelines for Large Appliance Coatings EPA 453/R-07-004 2007/09	Large appliance coatings.	07/21/2015	Readopt
Control Techniques Guidelines for Metal Furniture Coatings EPA 453/R-07-005 2007/09	Metal furniture coatings.	07/21/2015	Readopt
Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings EPA 453/R-08-003 2008/09	Miscellaneous Metal Parts Coatings Table 2 – Metal Parts and Products	12/20/2016	Readopt
	Miscellaneous Plastic Parts Coatings Table 4 - Automotive/Transportation and Business Machine Plastic Parts	N/A; New FND for the 2008 8-hr ozone standard ¹	New FND for the 2015 ozone standard ²
	Miscellaneous Plastic Parts Coatings Table 5 - Pleasure Craft Surface Coating	12/20/2016	Readopt
Control Techniques Guidelines for Fiberglass Boat Manufacturing Materials EPA-453/R-08-004 2008/09	Fiberglass Boat Manufacturing Materials	07/21/2015	Readopt

¹ A FND is required to be submitted for the 2008 ozone standard

² A FND is required to be submitted for the 2015 ozone standard

CTG	Source Category	Previously Adopted FNDs: 8-Hour Ozone Standard (84 ppb); 8-Hour Ozone Standard (75 ppb)	Current 2015 Ozone Standard (70 ppb)
Control Techniques Guidelines for the Oil and Natural Gas Industry EPA-453/B-16-001 2016/10	Oil and Natural Gas Industry	N/A; 02/06/2020	Readopt ³

³ A FND for Oil and Gas was adopted 01/21/2020 and submitted 02/06/2020. The current action reaffirms the adoption.

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CHAPTER 4 – Certification

Clean Air Act Emissions Statement Requirements Emission Statement Certification

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Clean Air Act Emissions Statement Requirements

Section 182(a)(3)(B) of the Clean Air Act (Act) requires all ozone nonattainment areas to have in place a program that requires emissions statements from stationary sources of NO_x and VOC. Specifically, section 182(a)(3)(B)(i) of the Act requires air agencies to submit to USEPA a SIP revision requiring the owner or operator of each stationary source to report and certify the accuracy of their reported NO_x and VOC emissions, beginning in 1993 and annually thereafter.

Section 182(a)(3)(B)(ii) of the Act allows air agencies to waive the requirements under subsection (i) for stationary sources emitting less than 25 tons per year of VOC or NO_x if the State provides an inventory of emissions from such class or category of sources, based on the use of the emission factors established by USEPA or other methods acceptable to USEPA as part of the inventories required under section 182(a)(1) (the base year emissions inventory) and section 182(a)(3)(A) (the periodic emissions inventory).

The emissions statement requirements for the 70 ppb 8-hour ozone standard are described in *Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area State Implementation Plan Requirements* (83 FR 62998, December 6, 2018). If a nonattainment area has a previously-approved emissions statement rule in force for a previous 8-hour or 1-hour ozone standard covering all portions of the nonattainment area for the 70 ppb 8-hour ozone standard, the existing rule should be sufficient for the 70 ppb 8-hour ozone standard. If the existing rule does not meet section 182(a)(3)(B) requirements, a revised or new rule would have to be submitted as part of the current ozone SIP.

AVAQMD Rule 107 – *Certification of Submissions and Emission Statements*, fulfills the section 182(a)(3)(B) emissions statement requirements. District Rule 107 was adopted on May 15, 2012, submitted to USEPA on September 21, 2012 and approved by USEPA into the SIP on April 11, 2013 (78 FR 21545, April 11, 2013). The boundaries of the AVAQMD nonattainment area for the 70 ppb 8-hour ozone standard are the same as for the 75 ppb ozone standard. We have reviewed existing Rule 107 to ensure it is adequate and, based on the rationale in the table below, determined that the existing rule is adequate to meet the section 182(a)(3)(B) emissions statement requirements for the 70 ppb 8-hour ozone standard.

The District hereby certifies that the existing provisions of Rule 107 adequately meet the emissions statement requirements of section 182(a)(3)(B) of the Act for the purposes of the 70 ppb 8-hour ozone standard, and that no revision of the rule is required.

Emission Statement Certification

Federal Clean Air Act (FCAA) §182(a)(3)(B) requires ozone nonattainment areas to mandate submittal of emission statement data from certain sources of VOC and NO_x.

The AVAQMD is certifying that the submitted Emission Statement Certification, covering the West Mojave Desert 8-Hour nonattainment areas for the 2015 ozone NAAQS, is at least as stringent as the requirements of FCAA §182(a)(3)(B) as specified in the final rule titled

Implementation of the 2015 National Ambient Air Quality Standard for Ozone: State Implementation Plan Requirements (83 FR 62998, December 6, 2018).

The FCAA stipulates the following emission statement requirement be met:

CAA 182(a)(3)(B) Requirements	AVAQMD Rule 107 Provision
<i>CAA 182(a)(3)(B)(i)</i>	
<p>“Within 2 years after November 15, 1990, the State shall submit a revision to the State implementation plan to require that the owner or operator of each stationary source of oxides of nitrogen or volatile organic compounds provide the State with a statement, in such form as the Administrator may prescribe (or accept an equivalent alternative developed by the State), for classes or categories of sources, showing the actual emissions of oxides of nitrogen and volatile organic compounds from that source.”</p>	<p>District Rule 107 was adopted on May 15, 2012, submitted to USEPA on September 21, 2012 and approved by USEPA into the SIP on April 11, 2013 (78 FR 21545, April 11, 2013) <i>§(B)(1) In accordance with the requirements of the 1990 Clean Air Act (Section 182 (a)(3)(B)(i)), the owner or operator of any stationary source that emits or may emit oxides of nitrogen or Volatile Organic Compounds (VOCs) shall provide the Air Pollution Control Officer (APCO) with a written statement showing actual emissions of oxides of nitrogen and VOCs from that source.</i></p>
<p>“The first such statement shall be submitted within 3 years after November 15, 1990. Subsequent statements shall be submitted at least every year thereafter.”</p>	<p>The District reports emission data electronically to USEPA through CARB on an annual basis. Data has been transmitted annually since 1993. <i>§(B)(1) Emission statements shall be submitted annually.</i></p>
<p>“The statement shall contain a certification that the information contained in the statement is accurate to the best knowledge of the individual certifying the statement.”</p>	<p>Each statement contains a certification that the information contained in the statement is accurate to the best knowledge of the completer.</p>
<p>“The State may waive the application of clause (i) to any class or category of stationary sources which emit less than 25 tons per year of volatile organic compounds or oxides of nitrogen if the State, in its submissions under subparagraphs (1) or (3)(A), provides an inventory of emissions from such class or category of sources, based on the use of the emission factors established by the Administrator or other methods acceptable to the Administrator. (FCAA §182(a)(3)(B)(ii))</p>	<p>Rule 107 – <i>Certification of Emissions Statements</i> §(c) allows a waiver provision contingent on reporting emissions to the state between 10-25 tons per year of VOC and NO_x.</p>

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Appendices

Appendix A – RACT Evaluations

1. Rule 442 – *Usage of Solvents*
2. Rule 1107 – *Coating of Metal Parts and Products*
3. Rule 1110.2 - *Emissions from Stationary, Non-Road and Portable Internal Combustion Engines*
4. Rule 1113 – *Architectural Coatings*
5. Rule 1124 – *Aerospace Assembly and Component Manufacturing Operations*
6. Rule 1130 – *Graphic Arts*
7. Rule 1145 – *Plastic, Rubber and Glass Coatings*
8. Rule 1151 – *Motor Vehicle and Mobile Equipment Coating Operations*
9. Rule 1151.1 – *Motor Vehicle Assembly Coating Operations*
10. Rule 1168 – *Adhesive Applications*
11. Rule 1171 – *Solvent Cleaning Operations*

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1. Rule 442 – *Usage of Solvents*

The AVAQMD was designated nonattainment under the 8-hour ozone standard. As such, the AVAQMD is required to impose RACT on all major VOC sources and all source categories subject to a CTG. Major VOC sources and CTG source categories in the AVAQMD are, however, generally covered by other rules in Regulations IV and XI of the AVAQMD SIP. Rule 442 applies only to sources that are not subject to any of these source-specific VOC control requirements and is intended as a “backstop” provision for small, otherwise unregulated sources. As such, the rule is not necessary to implement RACT requirements (72 FR 52791, 9/17/07). Rule 442 is not proposed for amendment at this time.

2. Rule 1107 – *Coating of Metal Parts and Products*

Rule 1107 - <i>Coating of Metal Parts and Products</i>	
Amended - 03/08/1996	
SIP Approval - 60 FR 36227, 07/14/1995	
<p>1. <i>Control of Volatile Organic Emissions from Existing Stationary Sources - Volume VI: Surface Coating of Miscellaneous Metal Parts and Products</i> (EPA 450/2-78-015 1978/06),</p> <p>2. <i>Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings, Table 2</i> (EPA 453/R-08-003 2008/09)</p> <p>3. <i>Control Techniques Guidelines: Industrial Cleaning Solvents</i> (EPA 453/R-06-001, September 2006)</p>	
1997 EPA TSD Recommendations	<p>1. Compliance records are required to be kept on-site for at least two years (see Section (F)(3)); EPA recommends that records be maintained on site for five years. (Corrected 1/22/18 amendment)</p> <p>2. Section (C)(6), "Prohibition of Sale" should be reinserted within the Rule. (Corrected 1/22/18 amendment)</p>
Other District Rules:	MDAQMD Rule 1115 - <i>Metal Parts & Products Coating Operations</i> (01/22/2018; 62 FR 67002,12/23/1997)
	BAAQMD Regulation 8, Rule 19 - <i>Surface Preparation and Coating of Miscellaneous Metal Parts and Products</i> (02/03/1993; 69 FR 62588, 10/27/2004)
	SCAQMD Rule 1107 - <i>Coating of Metal Parts and Products</i> (01/06/2016; version not shown as SIP approved)
Recommendation: Rule is proposed for amendment on April 21, 2020	
<p>Rule 1107 - <i>Coating of Metal Parts and Products</i> was most recently amended 03/08/1996. This rule was approved in to the SIP (60 FR 36227, 07/14/1995) and determined to fulfill RACT for the 1990 amendment of the Clean Air Act. The District has examined similar rules for Districts with similar or more severe attainment status and has determined that these rules have not been amended subsequent to the most recent amendment of AVAQMD Rule 1107. The District has received a verbal comment from EPA that this rule needs to have a 10 tpy exemption removed to conform with 2.7 tpy CTG limit. Rule 1107 is proposed for amendment at the April 21, 2020 Governing Board Meeting to incorporate this provision.</p>	

3. Rule 1110.2 – *Emissions from Stationary, Non-Road and Portable Internal Combustion Engines*

<i>Rule 1110.2 - Emissions from Stationary, Non-Road and Portable Internal Combustion Engines</i>	
Amended - 09/18/2018	
SIP LTD DIS/LTD APP Version - 04/21/04	69 FR 21482, 04/21/2004
SIP Submission sent 10/12/2018	
Applicable CTG	N/A
Other Documents	Alternative Control Techniques Document – NO _x Emissions from Stationary Reciprocating Internal Combustion Engines” (EPA-453/R-93-032), (updated September 2000, EPA-68-D98-026)
	USEPA’s Economic Incentive Programs Guidance (EPA-452/R-01-001)
Equivalent District Rules	SCAQMD Rule 1110.2 - <i>Emissions from Gaseous- and Liquid- Fueled Engines</i> (June 3, 2016; not SIP version)
	SJVUAPCD Rule 4701 - <i>Internal Combustion Engines - Phase I</i> (August 21, 2003; 69 FR 28061, 5/18/2004)
	SJVUAPCD Rule 4702 - <i>Internal Combustion Engines (Certified Equipment for Internal Combustion Engines)</i> (November 14, 2013; 81 FR 24029, 04/25/2016)
	BAAQMD Regulation 9 Rule 8 - Nitrogen Oxides and Carbon Monoxide From Stationary Internal Combustion Engines (July 25, 2007; not SIP version)
Recommendation: No changes proposed at this time	
<p>Rule 1110.2 - Emissions from Stationary, Non-Road and Portable Internal Combustion Engines was amended 09/18/2018. The Rule was amended to satisfy RACT requirements as evaluated by the availability, feasibility and cost-effectiveness of applying combustion source control measures related to internal combustion engines within the AVAQMD. The TSD issued for Rule 1110.2 on 04/21/2004 (69 FR 21482) identified deficiencies. EPA issued a Limited Approval/Disapproval at that time. The District incorporated the 2004 TSD recommendations in the 09/18/2018 amendment. Additional comments have not been received from EPA and there is a reasonable assumption that the current requirements of Rule 1110.2 are approvable as RACT. Rule 110.2 was submitted for inclusion in the SIP on 10/12/2018.</p>	

4. Rule 1113 – *Architectural Coatings*

Rule 1113 - <i>Architectural Coatings</i>	
Amended - 06/18/2013	
SIP Approval - 80 FR 76222, December 08, 2015	
1. EPA's National Volatile Organic Compound Emission Standard for Architectural Coatings (40 CFR Part 59, Subpart D) 2. CARB's Suggested Control Measures for Architectural Coatings (October 26, 2007)	
EPA TSD (Sep 2015) Recommendations for next rule revision:	1. To prevent the practice of “bundling” small containers, we recommend replacing paragraph (A)(3)(c) with the following text: With the exception of containers packed together for shipping to a retail outlet, warehouse, or a military distribution or redistribution facility, any architectural coating that is sold in a container with a volume of one liter (1.057 quart) or less provided the following requirements are met: a. The container is not bundled together to be sold as a unit that exceeds one liter (1.057 quarts), excluding containers packed together for shipping to a retail outlet. b. The label or any other product literature does not suggest combining multiple containers so that the combination exceeds one liter (1.057 quarts).
	2. References to EPA-Approved ASTM test methods should include the full title and date of the version being specified. For example: a. ASTM Designation D3273-00, “Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber.” b. ASTM Designation D7088-04, “Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry.”
	3. References to EPA-Approved state or local test methods should include the full title and may or not specify the date of the version. For example: a. South Coast Air Quality Management District Method 303-91 (Revised 1996), “Determination of Exempt Compounds.” b. Bay Area Air Quality Management District Method 43 (Revised 2005), “Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials.”
Other District Rules:	SCAQMD Rule 1113 - <i>Architectural Coatings</i> (02/05/2016; not version in SIP)
	SDCAPCD Rule 67.0.1 - <i>Architectural Coatings</i> (06/24/2015; 81 FR 68320, 10/04/2016)
	BAAQMD Regulation 8, Rule 3 - <i>Architectural Coatings</i> (07/01/2009; not version in SIP)
	FRAQMD Rule 3.15 - <i>Architectural Coatings</i> (08/04/2014; 80 FR 76222, 12/08/2015)
Recommendation: Rule 1113 may be amended to incorporate the provisions of the 2019 SCM	
Rule 1113 - <i>Architectural Coatings</i> was most recently amended June 18, 2013. This rule was approved in to the SIP (80 FR 76222, December 08, 2015). In the 2015 rule evaluation USEPA indicated that the district has no obligation to satisfy RACT. USEPA evaluated the rule for RACT-level controls as well as against EPA’s National Volatile Organic Compound Emission Standard for Architectural Coatings (40 CFR Part 59 Subpart D), and CARB’s SCM for Architectural Coatings, which is the basis for most of the most stringent architectural coating requirements in California. In 2019 CARB updated the Suggested Control Measure for Architectural Coatings. The District will evaluate Rule 1113 for possible amendment to incorporate the provisions of the 2019 SCM. Upon next amendment, USEPA recommendations will be incorporated.	

5. Rule 1124 – Aerospace Assembly and Component Manufacturing Operations

Rule 1124 - Aerospace Assembly and Component Manufacturing Operations	
Amended - 11/19/2013	
SIP Approval - 80 FR 60040, 10/05/2015	
<p>MACT - Aerospace Manufacturing and Rework Facilities (40 CFR 63 Subpart GG, commencing with §63.741)</p> <p>CTG - Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations (December 1997, EPA-453/R-97-004)</p>	
EPA TSD Recommendations for next rule revision:	1. Lower Adhesion Promoter Coating limit from 850 g/l, consistent with, e.g., SCAQMD Rule 1124 limit of 250 g/l.
	2. Lower Chemical Agent Resistant Coating limit from 550 g/l, consistent with, e.g., MDAQMD Rule 1118 limit of 500g/l.
	3. Lower Flight-Test Coating (All Other) limit from 840 g/l, consistent with, e.g., SJVAPCD Rule 4605 limit of 600 g/l.
	4. Lower Non-Autoclavable limit from 850 g/l, consistent with, e.g., MDAQMD Rule 1118 limit of 700 g/l.(0.18 psia) or less at 20°C (68°F).”
	5. Add a 600 g/l limit for Sprayable Sealant consistent with the CTG
	6. Break-out and capitalize “Topcoat” similar to “PRIMERS” and “ADHESIVES”
	7. Primers and Fuel-Tank Coating have a “general” limit, Topcoat and Sealants have an “other” limit, Flight-Test Coating has an “all other” limit, and Adhesives and Maskants have no similar catch-all limit. We recommend using consistent terminology throughout the table of limits.
Other District Rules:	SCAQMD Rule 1124 - Aerospace Assembly and Component Manufacturing Operations (9/21/2001; 67 FR 52611, 8/13/2002)
	MDAQMD Rule 1118 - Aerospace Assembly, Rework and Component Manufacturing Operations (10/26/2015; 06/21/2017 82FR28240
	SJVUAPCD Rule 4605 - Aerospace Assembly and Coating Manufacturing Operations (6/16/2011; 76 FR 70886, 11/16/2011)
Recommendation: Evaluate recommended lower limits	
<p>Rule 1124 - Aerospace Assembly and Component Manufacturing Operations was most recently amended 11/19/2013. This rule was approved in to the SIP (80 FR 60040, October 05, 2015) and determined to fulfill RACT. The District has examined similar rules for Districts with similar or more severe attainment status and has determined that some have been amended subsequent to the most recent amendment of AVAQMD Rule 1124 and therefore may require further analysis. The TSD issued for Rule 1124 in October of 2015 identified no deficiencies sufficient for EPA to proposed less than full approval at that time, but several items were recommended for consideration for the next rule revision. The District will evaluate these recommendations and review MDAQMD and SJVAPCD rule limits to determine if they affect current RACT. Rule 1124 may be amended to incorporate these provisions.</p>	

6. Rule 1130 – *Graphic Arts*

Rule 1130 - <i>Graphic Arts</i>	
Amended - 11/19/2013	
SIP Approval - 80 FR 76222 December 08, 2015	
<p>1. <i>Control of Volatile Organic Emissions from Existing Stationary Sources - Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks</i> (EPA-450/2-77-008, 1977/05)</p> <p>2. <i>Control of Volatile Organic Emissions from Existing Stationary Sources - Volume VIII: Graphic Arts-Rotogravure and Flexography</i> (EPA-450/2-78-033 1978/12)</p> <p>3. <i>Control Techniques Guidelines for Offset Lithographic Printing and Letterpress Printing</i> (EPA-453/R-06-002 2006/09)</p> <p>4. <i>Control Techniques Guidelines for Flexible Package Printing</i> (EPA-453/R-06-003 2006/09)</p> <p>5. <i>CTG for Paper, Fil, and Foil Coatings</i> EPA 453/R-07-003, September 2007)</p>	
EPA TSD Recommendations for next rule revision:	<p>1. (C)(5)(i) Requirements for Coating Applications – Paragraph (i) allows use of other coating application methods that are capable of “achieving at least 65 percent Transfer Efficiency” using the test method in Section (H)(8). The test method in Section (H)(8) only applies to spray equipment, which appears to duplicate Section (C)(5)(h) allowance for alternatives to high-volume low-pressure (HVLP) spray equipment. AVAQMD may want to review the applicability of Section (C)(5)(i) the next time the rule is amended. See SCAQMD Rule 1128 Section (C) (6)(H).</p> <p>2. (E)(3) Non-compliant Materials Records - Please add the following: “Violations of the requirement are considered to separate violations for each day.”</p> <p>3. An editorial error in section (G), Emission Reduction Credits (ERC), seems to allow sources to claim permit offsets for flexographic coatings above 300 g/l. AVAQMD’s email dated April 30, 2015 confirms that there are no flexographic printing operations in the District, and that no facility has used this provision. Nonetheless, please correct or delete this provision at the next rule revision.</p> <p>4. (H) Test Methods (1) - Include the Title for EPA Test Method 24 (Determination of Volatile Matter Content, Water Content, Density Volume Solids, and Weight Solids of Surface Coatings) and EPA Test Method 24A (Determination of Volatile Matter Content and Density of Printing Inks and Related Coatings).</p> <p>5. (H) Test Methods (2) and (5) - The Little Blue Book recommends that references to EPA-approved ASTM methods should include the full title and date of the version being specified.</p>
Other District Rules:	<p>YSAQMD Rule 2.29 - <i>Graphic Arts Printing Operations</i> (07/11/18; version not in SIP)</p> <p>SCAQMD Rule 1130 - <i>Graphic Arts</i> (05/02/14; 80 FR 40915, 07/14/15)</p>
Recommendation: No changes proposed.	
<p>Rule 1130 - <i>Graphic Arts</i> was most recently amended November 19, 2013. This rule was approved in to the SIP (80 FR 60040, October 05, 2015) and determined to fulfill RACT requirements. The District has examined similar rules for Districts with similar or more severe attainment status and has determined that some have been amended subsequent to the most recent amendment of AVAQMD Rule 1130. SCAQMD Rule 1130 was included in the SIP after the SIP approval of AVAQMD Rule 1130. SCAQMD Rule 1130 and YSAQMD Rule 2.29 have been reviewed and AVAQMD limits are consistent with applicable categories and requirements. The TSD issued for Rule 1130 in October 2015 identified no deficiencies sufficient for EPA to propose less than full approval at that time, but several items were recommended for consideration for the next rule revision. These recommendations do not appear to be substantive. The District will evaluate these recommendations and determine if they affect current RACT.</p>	

7. Rule 1145 – *Plastic, Rubber, And Glass Coatings*

Rule 1145 - <i>Plastic, Rubber, And Glass Coatings</i>	
Amended - 02/14/1997	
SIP Approval - 58 FR 66286 December 20, 1993 (SCAQMD on the 01/10/1992 amendment)	
1. CTG for Miscellaneous Metal and Plastic Parts Coating EPA-453/R-08-003 2008/09	
Table 3 - Plastic Parts and Products	No action necessary
Other District Rules:	Placer Rule 249 - <i>Surface Coating of Plastic Parts and Products</i> (08/08/2013; 80 FR 16289 03/27/2015)
	SCAQMD Rule 1145 - <i>Plastic, Rubber and Glass Coatings</i> (12/04/09; 75 FR 40726, 07/14/10)
	SAC Metro - <i>Surface Coating of Plastic Parts and Products</i> (03/22/2018; not recorded yet)
Recommendation: No changes proposed.	
<p>Rule 1145 - <i>Plastic, Rubber, And Glass Coatings</i> was most recently amended February 14, 1997. This rule was approved in to the SIP December 20, 1993 (58 FR 66286) and determined to fulfill RACT requirements. The District has examined similar rules for Districts with similar or more severe attainment status and has determined that some have been amended subsequent to the most recent amendment of AVAQMD Rule 1145. SCAQMD Rule 1145 was included in the SIP after the SIP approval of AVAQMD Rule 1145. SCAQMD Rule 1145 and Placer Rule 249 have been reviewed. AVAQMD Rule 1145 limits are consistent with the limits in the CTG for Table 3-Plastic Parts and the reviewed similar District RACT rules.</p>	

8. Rule 1151 - *Motor Vehicle and Mobile Equipment Coating Operations*

Rule 1151 - *Motor Vehicle and Mobile Equipment Coating Operations*

Amended - 06/19/2012

SIP Approval -78 FR 58459, September 24, 2013

1. *Control of Volatile Organic Emissions from Existing Stationary Sources - Volume II: Surface Coating of Cans, Coils, Paper, Fabrics, Automobiles, and Light-Duty Trucks, (FND Section 6) (EPA 450/2-77-008 1977/05)*
2. *Control of Volatile Organic Emissions from Existing Stationary Sources – Volume VI: Surface Coating of Miscellaneous Metal Parts and Products (EPA-450/2-78-015, 1978/06)*
4. *Control Techniques Guidelines for Miscellaneous Metal and Plastic Parts Coatings, (FND Table 6) (EPA-453/R-08-003, 2008/09)*
5. *Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings (EPA 453/R-08-006 2008/09) (FND)*
6. *Protocol for Determining the Daily Volatile Organic Compounds Emission Rate of Automobile and Light-Duty Truck Primer-Surfacer and Topcoat Operations (EPA 453/R-08-002 2008/09) (FND)*
7. CARB SCM for Automotive Coatings, October 20, 2005

EPA TSD
Recommendations for
next rule revision:

There are 17 recommendations, none of which prohibit less than full approval, that will be incorporated into the next rule revision.

Other District Rules:

SDAPCD Rule 67.20.1 - *Motor Vehicle and Mobile Equipment Coating Operations* (06/30/10; not SIP approved)
 SCAQMD Rule 1151 - *Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations*
 (09/05/14; 80 FR 76219, 12/08/15)
 BAAQMD Regulation 8, Rule 45 - *Motor Vehicle and Mobile Equipment Coating Operations*
 (12/03/08; 65 FR 34101, 05/26/00)
 MDAQMD 1116 *Auto Refinishing* (04/05/2011; 77 FR 47536, 08/09/2012)

Recommendation: No changes proposed

Rule 1151 - *Motor Vehicle and Mobile Equipment Coating Operations* was most recently amended June 19, 2012. This rule was approved in to the SIP (78 FR 584596, September 24, 2013) and determined to fulfill RACT requirements of CAA §182(b)(2) and §182(f). The District has examined similar rules for Districts with similar or more severe attainment status and has determined that some have been amended subsequent to the most recent amendment of AVAQMD Rule 1151. SCAQMD Rule 1151 was included in the SIP after the SIP approval of AVAQMD Rule 1151. Coating limits in AVDAQMD Rule 1151 are consistent with those in SCAQMD Rule 1151 and MDAQMD Rule 1116 and further analysis is not necessary. The TSD issued for Rule 1151 in September 2012 identified no deficiencies sufficient for EPA to propose less than full approval at that time, but several items were recommended for consideration for the next rule revision. These recommendations are not of a substantive nature. The District will address these recommendations when the rule is next amended.

9. Rule 1151.1 - *Motor Vehicle Assembly Coating Operations*

Rule 1151.1 - <i>Motor Vehicle Assembly Coating Operations</i>	
Adopted 06/20/2017	
SIP Approval - 83 FR 24033, May 24, 2018	
1. <i>Control Techniques Guidelines for Automobile and Light-Duty Truck Assembly Coatings</i> (EPA 453/R-08-006 2008/09)	
EPA TSD Recommendations for next rule revision:	No recommendations
Other District Rules:	<p>SJVUDAPCD Rule 4602 - <i>Motor Vehicle Assembly Coating Operations</i> (09/17/2009; 76 FR 67369, 11/01/2011)</p> <p>BAAQMD Regulation 8, Rule 13 - <i>Light and Medium Duty Motor Vehicle Assembly Plants</i> (12/20/1995; 62 FR 66998, 12/23/1997)</p>
Recommendation: No changes proposed at this time.	
<p>Rule 1151.1 - <i>Motor Vehicle Assembly Coating Operations</i> was adopted on June 20, 2017. This rule was approved in to the SIP (83 FR 24033, May 24, 2018) and determined to fulfill RACT requirements of CAA §182(b)(2) and §182(f). The District has examined similar rules for Districts with similar or more severe attainment status and has determined that the most recent adoption of AVAQMD Rule 1151.1 are consistent with those in SJVUDAPCD Rule 4602 and BAAQMD Regulation 8, Rule 13 and further analysis is not necessary. The TSD issued for Rule 1151.1 in February 2018 2012 identified no deficiencies sufficient for EPA to propose less than full approval at that time, and no recommendations for consideration for the next rule revision.</p>	

10. Rule 1168 - *Adhesive and Sealant Applications*

<i>Rule 1168 -Adhesive and Sealant Applications</i>	
Last Amended 09/20/2011	
SIP Approval - 77 FR 58313, September 20, 2012	
Applicable CTG - <i>Control Techniques Guidelines for Miscellaneous Industrial Adhesives</i> (EPA-453/R-08-005 2008/09)	
EPA TSD Recommendations for next rule revision:	There are 6 recommendations, none of which prohibit less than full approval, that will be incorporated into the next rule revision.
Other District Rules:	SBCAPCD Rule 353 - Adhesives and Sealants (06/21/2012, 78 FR 53680 08/30/2013)
Recommendation: No changes proposed at this time.	
<p>Rule 1168- <i>Adhesive and Sealant Applications</i> was last amended on 09/20/2011. This rule was approved in to the SIP (77 FR 58313, September 20, 2012) and determined to fulfill RACT requirements of CAA §182(b)(2) and §182(f). The District has examined similar rules for Districts with similar or more severe attainment status and have determined that the most recent adoption of AVAQMD Rule 1168 are consistent with those in SBCAPCD Rule 353 and further analysis is not necessary. The TSD issued for Rule 1168 in May 2012 identified recommendations for the next rule revision. The recommendations were non-substantive. EPA staff recommended full approval of Rule 1168.</p>	

11. Rule 1171 - *Solvent Cleaning Operations*

<i>Rule 1171 - Solvent Cleaning Operations</i>	
Amended - August 21, 2018	
SIP Approved Version - April 23, 2018	84 FR 31684, 07/02/2019
Applicable CTG	<i>Control of Volatile Organic Emissions from Solvent Metal Cleaning</i> (EPA-450/2-77-022, November 1977) <i>Control Techniques Guidelines for Industrial Cleaning Solvents</i> (EPA-453/R-06-001, September 2006)
	CARB's <i>Organic Solvent Cleaning and Degreasing Operations</i> " (July 18, 1991)
TSD Recommendations	1. Section (A)(2)(a) addresses Rule 1171 Applicability. The District should consider extending the rule applicability to include all persons that supply, sell or offer for sale, solvent cleaning materials for use in solvent cleaning operations, consistent with SCAQMD 1171, SMAQMD Rule 466 and YSAQMD Rule 2.31.
	2. Section (C)(1)(a) addresses the VOC content limits for solvent cleaning activities. The District should consider lowering the general cleaning VOC content limit in each activity category to 25 g/l for consistency with other Districts
Other District Rules	MDAQMD Rule 1104 - <i>Organic Solvent Degreasing Operations</i> (04/23/2018; 84 FR 31682, 07/02/2019)
	YSAQMD Rule 2.31 - <i>Solvent Cleaning and Degreasing</i> (05/08/2013, 80 FR 23449, 04/28/2015)
	SCAQMD Rule 1171 - <i>Solvent Cleaning Operations</i> (2/1/2008; 76 FR 60376, 9/29/2011)
Recommendation: No changes proposed at this time	
Rule 1171 - <i>Solvent Cleaning Operations</i> was amended August 21, 2018. The Rule was SIP approved (07/02/2019, 84 FR 31684). There are no equivalent rules from other Districts which have been amended subsequent to the approval that suggest RACT has changed.	

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