



Draft Staff Report

Mariposa County Air Pollution Control District

Reasonably Available Control Technology

State Implementation Plan

**For the 2015 and 2008 Ozone National Ambient Air Quality
Standards**

October 18, 2023

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Appendix A – List of CTGs

Acronyms

AQMD – Air Quality Management District

BACT – Best Available Control Technology

CAA – Federal Clean Air Act

CARB – California Air Resources Board

CEIDARS – California Emission Inventory Development and Reporting System

CTG – Control Technique Guidelines

District or MCAPCD – Mariposa County Air Pollution Control District

EPA – US Environmental Protection Agency

MACT – Maximum Achievable Control Technology

MCAPCD or District – Mariposa County Air Pollution Control District

NAAQS – National Ambient Air Quality Standards

NOx – Oxides of Nitrogen

PPB – Parts per billion

RACT – Reasonably Available Control Technology

ROG – Reactive Organic Gases

SIP – State Implementation Plan

TOG – Total Organic Gases

EDCAQMD – El Dorado County Air Quality Management District

FRAQMD – Feather River Air Quality Management District

NSAQMD – Northern Sierra Air Quality Management District

SJVAPCD – San Joaquin Valley Air Pollution Control District

SMAQMD – Sacramento Metropolitan Air Quality Management District

VCAPCD – Ventura County Air Pollution Control District

YSAQMD – Yolo-Solano Air Quality Management District

1 Summary

2 State Implementation Plan (SIP) revision is being submitted by the Mariposa County Air Pollution
3 Control District (District) to the U.S. Environmental Protection Agency (EPA) to fulfill requirements
4 under the Federal Clean Air Act (CAA). Currently, Mariposa County has been designated as “Moderate”
5 nonattainment for the 2015 8-hour ozone National Ambient Air Quality Standards (NAAQS or
6 standard).

7 As part of the SIP, CAA requires that sources located in non-attainment areas designated as moderate
8 or above implement reasonably available control technology (RACT) for:

- 9 1. Source categories covered by control techniques guidelines (CTG);
- 10 2. All major stationary sources of volatile organic compounds (ROGs) and oxides of nitrogen (NOx)
11 that are not subject to a CTG.

12 Alternatively, the local air district may declare that there are no sources in the non-attainment area
13 subject to RACT and adopt a Negative Declaration.

14 Mariposa County Air Pollution Control District staff (MCAPCD or District) has prepared this RACT
15 analysis for all sources within the County. District staff have determined that:

- 16 1. There are no major sources in the District subject to RACT requirements and do not anticipate
17 any major sources subject to CTGs. Therefore, a negative declaration is adopted for such CTGs.
- 18 2. There are current District regulations that need to be amended in order to meet RACT
19 requirements. The regulations cover sources in two CTG categories:
 - 20 - Storage of Petroleum Liquids in Fixed Roof Tanks
 - 21 - Design Criteria for Stage 1 Vapor Control Systems for Gasoline Service Stations

22 MCAPCD proposes to amend the regulations within the next twelve six months in order to meet the
23 RACT requirements. Specific District actions are described in this RACT evaluation.

1 **1.0 Introduction**

2 The County’s air quality is regulated by the Mariposa County Air Pollution Control District. This agency
3 is responsible to maintaining compliance with various state and federal ambient air quality standards.
4 Air quality management work to attain standards in Mariposa County is a shared responsibility
5 between EPA, California Air Resources Board (CARB) CARB and the District. EPA is responsible for
6 emissions associated with locomotives, airplanes, ships, etc. The State has the authority to manage
7 emissions from mobile sources such as cars, trucks, construction equipment, etc. The District has the
8 authority to manage emissions from stationary and area sources within the County that are potentially
9 subject to RACT.

10 **1.1 Background**

11 The Federal Clean Air Act (CAA) of 1970 required the EPA to develop health-based National Ambient
12 Air Quality Standards (NAAQS) for six common, yet harmful, outdoor air pollutants in order to protect
13 public health and the environment. EPA periodically reviews the NAAQS and associated scientific basis
14 in determining appropriate revisions. Accordingly, EPA establishes new standards following advances in
15 scientific understanding of the pollutant and its potential health effects.

16 **1.2 Ozone**

17 Ozone is a reactive gas that occurs in the upper atmosphere where harmful ultraviolet rays react with
18 oxygen. It also occurs in the troposphere (ground level) where it is formed as a result of chemical
19 reactions primarily involving oxides of nitrogen (NOx) and reactive organic gases (ROG) in the presence
20 of sunlight. In Mariposa County, NOx emissions play a dominate role in the formation of ozone.

21 Research has shown that exposure to unhealthful levels of ozone can damage the tissues of the
22 respiratory tract, causing inflammation and irritation, and result in symptoms such as coughing, chest
23 tightness and worsening of asthma symptoms. In addition, ozone causes substantial damage to crops,
24 forests and native plants. Ozone can also damage materials such as rubber and plastics.

25 **1.3 2008 Ozone NAAQS**

26 In 2008, EPA established a health based ambient air quality 8-hour ozone standard of 75 parts per
27 billion (75 ppb standard). Mariposa County was designated “Marginal” nonattainment for the 75 ppb
28 standard in 2012¹. In 2016, the EPA determined that the Mariposa County failed to attain the 75 ppb
29 standard by the applicable attainment date, and reclassified the area “Moderate” nonattainment². In
30 2019, EPA issued a notice of final rule making, finalizing approval to determine that Mariposa County
31 attained the 75 ppb standard by the “Moderate” area attainment deadline³. This determination did
32 not suspend the requirement for Mariposa County to submit a RACT analysis for the 75 ppb standard.

¹ 77 Fed Reg. 30088. <https://www.govinfo.gov/content/pkg/FR-2012-05-21/pdf/2012-11618.pdf>

² 81 Fed Reg. 26697. <https://www.govinfo.gov/content/pkg/FR-2016-05-04/pdf/2016-09729.pdf>

³ 84 Fed Reg. 44238. <https://www.govinfo.gov/content/pkg/FR-2019-08-23/pdf/2019-17796.pdf>

1 **1.4 2015 Ozone NAAQS**

2 In 2015, EPA adopted a more stringent 8-hour ozone NAAQS of 70 ppb⁴. In 2018, Mariposa County was
3 designated as “Marginal” nonattainment for the 2015 ozone NAAQS⁵. The nonattainment area was re-
4 designated as “Moderate”, effective November 7, 2022. While Mariposa County is currently designated
5 as “Moderate” nonattainment for the 2015 8-hour ozone standard, the District is requesting a re-
6 designation to “Serious” to allow more time to attain the NAAQS. This request is contained in the SIP.

7 **1.5 2008 Ozone NAAQS**

8 On March 27, 2008, the EPA published a final rule lowering the federal ozone standard NAAQS from
9 0.084 ppm to 0.075 ppm. When the more stringent 2015 ozone NAAQS was adopted, EPA did not
10 revoke the 2008 ozone NAAQS. Specifically, areas that violated the 2008 ozone NAAQS would continue
11 to be subject to this standard.

12 In 2019, the ozone design value at the Turtleback Dome monitoring station exceeded the 0.075 ppm 8-
13 hour ozone NAAQS. As a result, Mariposa County remains subject to the 2008 ozone NAAQS and must
14 demonstrate how the standard would be attained. The ozone attainment plan for the more stringent
15 2015 ozone NAAQS would also demonstrate how the 2008 ozone NAAQS would be met.

⁴ 80 Fed. Reg. 65292. <https://www.govinfo.gov/content/pkg/FR-2015-10-26/pdf/2015-26594.pdf>

⁵ 83 Fed Reg. 25776. <https://www.govinfo.gov/content/pkg/FR-2018-06-04/pdf/2018-11838.pdf>

1 **2.0 Challenges**

2 **2.1 Geography and Meteorology**

3 Mariposa County is a rural area and the home of Yosemite National Park. As of the 2020 U.S. Census, the
4 population of the County was 17,131. There are no incorporated cities in Mariposa County, however,
5 there are communities recognized as census-designated places for statistical purposes. The County
6 occupies 1,463 square miles. The economy of Mariposa County is dominated by tourism and there is no
7 heavy industry in the County. Yosemite National Park tourism generates over one-half of all the private
8 sector revenue and generates most of the vehicular traffic and emissions. These emissions, along with
9 emissions from adjacent air basins, are the principal drivers of ozone in the County.

10 In Mariposa County, the summers are hot, arid, and mostly clear, which are favorable environmental
11 conditions for ozone formation. The winters are relatively cold and wet. Over the course of the year, the
12 temperature varies between 33 F to 89 F and is rarely below 25 F or above 96 F.

13 **2.2 Pollutant Transport**

14 Transport of emissions from San Joaquin Valley, and to a lesser extent the Sacramento metropolitan
15 area, is the predominant cause of high ozone concentrations and exceedances in Mariposa County.

16 Wind flow into Mariposa County is typically from the west-northwest to south-southwest. Winds are
17 generally daytime upslope and nighttime downslope flows, caused by the differential heating or cooling
18 of air near mountain ground surfaces relative to air at the same height over land at lower elevations.
19 Due to meteorological conditions and its geographic location downwind of the densely populated
20 Central Valley, Mariposa County is heavily impacted by emissions from adjacent air basins. These winds
21 transport ozone and ozone precursors from the Central Valley into Mariposa County.

3.0 RACT SIP Requirements

Under sections 182(b)(2) and 182 (f) of the federal Clean Air Act (CAA), non-attainment areas are obligated to implement RACT for sources that are subject to CTGs issued by the EPA. A list of CTGs is provided in Appendix A. RACT is also required for major sources of ROG and NOx. These are referred to as non-CTG sources.

RACT is defined as the lowest emissions limitation that a particular source is capable of achieving that is reasonably available considering technological and economic feasibility⁶. RACT requirements are included in the CAA to ensure that significant source categories of ozone precursor emissions are controlled to a ‘Reasonable’ extent, but not necessarily to the more stringent Best Available Control Technology (BACT) or Maximum Achievable Control Technology (MACT).

According to EPA’s implementation of the 2015 ozone NAAQS, areas classified as “Moderate” non-attainment or higher must submit a demonstration that their current rules fulfill the 8-hour ozone RACT for all categories and all non-CTG major sources as part of their ozone SIP.

The current RACT SIP is based on EPA guidance issued March 6, 2015⁷ and EPA Region 9 Guidance issued March 9, 2006⁸. This guidance states that the RACT SIP should contain the following elements:

- Describe efforts to identify all source categories within the District requiring RACT, including CTG sources and non-CTG sources.
- Submit a negative declaration where there are no facilities (major or minor) within the District subject to CTGs.
- For all categories needing RACT, list the state/local regulation that implements RACT. EPA recommends that the date EPA approved these regulations as fulfilling RACT.
- Describe the basis for concluding that the regulations fulfill RACT. The basis includes, in part, review of regulations adopted by other state and local agencies. While not explicitly stated, the comparison needs to be with other Districts and States that have similar non-attainment designation. For the current requirements, the focus is on other California Districts that have been designated as being “Serious”.
- Some Districts may use CAPCOA’s September 2003, Potential All Feasible Measures (AFM) Report to help demonstrate RACT. If so, the RACT SIP should certify that local regulations are equivalent to AFM, justify the assumption that the AFM fulfilled RACT in 2003, and include some sort of certification/demonstration that no additional controls have become more reasonable available since then.

⁶ 44FR 53762; September 17, 1979.

⁷⁷ “Questions Related to RACT in 8-Hour Ozone Implementation”. EPA May 18, 2006.

⁸ Letter from EPA to California Air Resources Board March 9, 2006.

1 **4.0 RACT Determination and Findings**

2 A RACT analysis involves the following steps:

- 3 1. Identify all CTG categories for which there are no facilities in the District. In such cases, seek a
- 4 negative declaration for these categories;
- 5 2. Demonstrate that all major NOx and ROG sources are covered by RACT rules. For Mariposa
- 6 County, the major source threshold is 50 tons per year for either NOx or ROG emissions;
- 7 3. For all sources subject to RACT, demonstrate that the District rules for ozone precursors satisfy
- 8 RACT levels of stringency and enforceability;
- 9 4. Identify District actions required based on the RACT analysis.

10 **4.1 Identify CTG Categories with No Sources**

11 District staff reviewed the list of all permitted sources⁹⁹. A review of the District files indicates that
12 there are no stationary sources or emitting facilities for the following CTG Categories. The District does
13 not anticipate that any known businesses will propose constructing any of these sources in the future.

14 To confirm that there are no operating facilities in the District that fall under a source category with
15 RACT guidelines, Staff checked the following records:

- 16 • CARB’s CEIDARS Database
- 17 • Website searches for facilities in Mariposa County
- 18 • Electronic ‘Yellow Pages’ for Mariposa County
- 19 • Consultation with County air quality planning staff

20 Staff did not find any operating facilities in Mariposa County under the source categories with RACT
21 guidance. Therefore, the District is making a Negative Declaration for all CTGs except:

- 22 • Storage of petroleum liquids in a fixed roof tank
- 23 • Design criteria for Stage 1 vapor control systems at gasoline service stations

24 The list of CTGs for which Mariposa County is submitting a negative declaration appears in Table 4-1.

25
26
27
28

⁹⁹ The District maintains a record of all permitted sources. These records are not available on-line.

1
2

Table 4-1: CTG Categories with No Sources in Mariposa County

	CTG #	CTG Title
1	EPA-450/2-77-008	Surface Coating of Cans
2	EPA-450/2-77-008	Surface Coating of Coils
3	EPA-450/2-77-008	Surface Coating of Paper
4	EPA-450/2-77-008	Surface Coating of Fabric
5	EPA-450/2-77-008	Surface Coating of Automobiles and Light-Duty Trucks
6	EPA-450/2-77-022	Solvent Metal Cleaning
7	EPA-450/2-77-025	Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds
8	EPA-450/2-77-026	Tank Truck Gasoline Loading Terminals
9	EPA-450/2-77-032	Surface Coating of Metal Furniture
10	EPA-450/2-77-033	Surface Coating for Insulation of Magnet Wire
11	EPA-450/2-77-034	Surface Coating of Large Appliances
12	EPA-450/2-77-035	Bulk Gasoline Plants
13	EPA-450/2-77-037	Cutback Asphalt
14	EPA-450/2-78-015	Surface Coating of Miscellaneous Metal Parts and Products
15	EPA-450/2-78-029	Manufacture of Synthesized Pharmaceutical Products
16	EPA-450/2-78-030	Manufacture of Pneumatic Rubber Tires
17	EPA-450/2-78-032	Factory Surface Coating of Flat Wood Paneling
18	EPA-450/2-78-033	Graphic Arts-Rotogravure and Flexography
19	EPA-450/2-78-036	Leaks from Petroleum Refinery Equipment
20	EPA-450/2-78-051	Leaks from Gasoline Tank Trucks and Vapor Collection Systems
21	EPA-450/3-82-009	Large Petroleum Dry Cleaners
22	EPA-450/3-83-006	Leaks from Synthetic Organic Chemical and Polymer Manufacturing Equipment

23	EPA-450/3-83-007	Equipment Leaks from Natural Gas/Gasoline Processing Plants
24	EPA-450/3-83-008	Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins
25	EPA-450/3-84-015	Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry
26	EPA-450/4-91-031	Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry
27	EPA-453/R-96-007	Wood Furniture Manufacturing Operations
28	EPA-453/R-94-032	ACT Surface Coating Operations at Shipbuilding and Ship Repair Facilities
29	59 FR29216; 6/06/94	NESHAPS Aerospace Manufacturing and Rework
30	EPA-453/R-06-001	Industrial Cleaning Solvents
31	EPA-453/R-06-002	Offset Lithographic Printing and Letterpress Printing
32	EPA-453/R-06-003	Flexible Package Printing
33	EPA-453/R-06-004	Flat Wood Paneling Coatings
34	EPA 453/R-07-003	Paper, Film, and Foil Coatings
35	EPA 453/R-07-004	Large Appliance Coatings
36	EPA 453/R-07-005	Metal Furniture Coatings
38	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings
39	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings
40	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings
41	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings
42	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings
43	EPA 453/R-08-004	Fiberglass Boat Manufacturing Materials
44	EPA 453/R-08-005	Miscellaneous Industrial Adhesives
45	EPA 453/R-08-006	Automobile and Light-Duty Truck Assembly Coatings
46	EPA 453/B-16-001	Oil and Natural Gas Industry

4.2 Demonstrate Major Non-CTG Sources are Covered by RACT

The current classification for both the 2008 and 2015 zone standard is “Moderate”. The threshold for a major source is 100 tons per year. However, with the voluntary request to reclassify as “Serious”, the threshold would become 50 tons per year for NOx and ROG. Currently, there are no existing or anticipated major sources of NOx or ROG in Mariposa County. Mariposa County submits a negative declaration for major stationary sources of NOx and ROG.

4.3 Demonstrate How Regulations Fulfill Current RACT Requirements

There are two source categories in Mariposa County subject to the CTGs.

Table 4-2: CTG Categories with Sources in Mariposa County

No.	CTG Category	CTG Title	CTG	CTG Date
1	Tanks	Storage of Petroleum Liquids in Fixed Roof Tanks	EPA-450/2-77-036	Dec 1997
2	ROG Control	Design Criteria for Stage 1 Vapor Control Systems Gasoline Service Stations	EPA-450/R-75-102	Nov 1975

Currently, there are two District Rules that cover these CTGs.

- Rule 213: Storage of Petroleum Products
- Rule 900: Benzene Airborne Control Measures at retail Service Stations

These are discussed in this section.

District Rule 213 Description

Rule 213 applies to tanks with a capacity of 250 gallons or greater with a permanent submerged fill pipe, unless the tank is equipped with a vapor recovery system or is a pressurized tank or is equipped with a floating roof. Tanks with a capacity greater than 40,000 gallons must be equipped with a vapor recovery system or must be equipped with a floating roof or must be pressurized.

This Rule was last amended (need date). The SIP approval date is August 22, 1977.

Status of EPA Approval in the California SIP

Rule 213 was approved and appears in the SIP last updated September 27, 2022. However, the language and content in the District’s version of Rule 213 differs from the language that was approved by the EPA. The District’s version of Rule 213 excludes reference to H&S Code Section 39068.2, Article 2, Chap 3, Part

1 1 Division 26. The District version includes definitions (in Part A) that do not appear in the EPA version
2 of the Rule. In terms of stringency, both the EPA and District’s versions of Rule 213 are equivalent.

3 **Comparison with Rules at Other District(s) Rules**

4 To demonstrate that RACT is satisfied, District staff reviewed similar rules promulgated at other Districts
5 in California to confirm the scope and stringency of each rule. Rules promulgated at the following
6 Districts were reviewed:

- 7 • San Joaquin Valley Air Pollution Control District (SJVAPCD)
- 8 • Sacramento Metropolitan Air Quality Management District (SMAQMD)
- 9 • Feather River Air Quality Management District (FRAQMD)
- 10 • Northern Sierra Air Quality Management District (NSAQMD)
- 11 • El Dorado County Air Quality Management District (EDCAQMD)
- 12 • Yolo-Solano Air Quality Management District (YSAQMD)
- 13 • Ventura County Air Pollution Control District (VCAPCD)

14 Although the staff reviewed the regulations of these Districts, only FRAQMD, NSAQMD, EDCAQMD,
15 YSAQMD and VCAPCD have been designated as being “Serious” non-attainment. Other Districts have
16 been designated as being “Severe” or “Extreme”. Therefore, the current RACT analysis will focus only
17 on current regulations in District designated as being “Serious” Rule 213 was compared with similar rules
18 at FRAQMD, NSAQMD, EDCAQMD, YSAQMD and VCAPCD. The results of this comparison are
19 summarized below:

20 NSAQMD Rule 219¹⁰ (Storage of Gasoline Products at Bulk Facilities) is similar to Rule 213, however, Rule
21 2019 has not been SIP approved)

22 FRAQMD Rule 3.9¹¹ (Organic Liquid Storage and Transfer) has not been SIP approved

23 EDCAQMD There are no rules related to storage of organic liquids

24 YSAQMD Rule 2.21¹² (Organic Liquid Storage and Transfer) this rule was SIP approved April 2, 2018. See
25 Table 4-3 for rule comparison VCAPCD Rule 71.2¹³ (Storage of Reactive Organic Compound Liquids)
26 approved December 6, 1993. See Table 4-3 for Rule comparison

27

¹⁰ Available at: https://myairdistrict.com/wp-content/uploads/2016/02/Reg_II_-_219.pdf

¹¹ Available at: <https://ww2.arb.ca.gov/sites/default/files/classic/technology-clearinghouse/rules/RuleID895p.pdf>

¹² Available at: <https://www.ysaqmd.org/wp-content/uploads/2020/05/2.21.pdf>

¹³ Available at: <http://www.vcapcd.org/Rulebook/Reg4/RULE%2071.2.pdf>

1 **Table 4-3: Rule Comparison**

Requirement or Applicability	MCAPCD Rule 213 Storage of Petroleum Products	YSAQMD Rule 2.21 Organic Liquid Storage and Transfer	VCAPCD Rule 71.2 Storage of Reactive Organic Compound Liquids
Tank Size	40,000 gallons with vapor pressure above 1.5 psia	40,000 gallons	40,000 gallons
Use of submerged fill pipe for tanks above 250 gallons	X	X	X
Use of floating roof tanks	Required if vapor pressure equals to or exceeds 1.5 psia	Required if vapor pressure equals to or exceeds 11 psia	Required.
Use of vapor recovery system	Required if no floating roof tank is used	Required if no floating roof tank is used	Required if no floating roof tank is used

2 The above analysis shows that Rule 213 is equally stringent as similar rules at YSAQMD and VCAPCD. As
 3 a result, no rule revision is required.

4 **1) District Rule 900: Benzene Airborne Control Measure at Retail Service Stations**

5 Rule 900 consists of two parts:

- 6 1) Transfer of gasoline from delivery trucks into a stationary storage tank.
- 7 2) Transfer of gasoline from gasoline storage tanks into motor vehicles.

8 The Rule requires the use of Phase I and II vapor recovery systems when transferring gasoline to
 9 storage tanks and to vehicles.

10 **Status of EPA Approval in the California SIP**

11 Rule 900 has not been approved by the EPA and does not appear in the California SIP.

12 **Comparison with Rules at Other District(s) Rules**

13 Currently, the most stringent district rule limiting emissions from the transfer of gasoline to and from
 14 storage tanks are:

- 15 • SCAQMD Rule 461
- 16 • SJVAPCD Rule 4622

17

1 These Districts, however, are classified as “Extreme” non-attainment for the ozone standard. A more
2 appropriate comparison would be with the current regulations at Districts classified as ‘Serious’.
3 These Districts and regulations are:

- 4
- 5 • NSAQMD Rules 214¹⁴ and 215¹⁵ (Phase I and II Vapor recovery Requirements)
- 6 • FRAQMD Rule 3.8¹⁶ (Gasoline Dispensing Facilities)
- 7 • EDCAQMD Rule 238¹⁷ (Gasoline Transfer and Dispensing)
- 8

9 Rule 900 is not as stringent as these rules. While these rules also require the use of Phase I and II vapor
10 recovery systems when transferring gasoline into storage tanks and vehicles, these rules have a
11 different annual throughput exemption level as Rule 900. FRAQMD Rule 3.8 has a throughput
12 exemption level of 10,000 gallons per month. Rule 900 contains no such exemption.

13 **4.4 Proposed District Actions to Meet RACT**

- 14 1) Revise Rule 900 or submit additional rule for Gasoline Service Stations
- 15 2) Submit to CARB and EPA for review and comment
- 16 3) Issue a public notice informing the public of the rule revision
- 17 4) Submit revised or new rules to MCAPCD Board for approval
- 18 5) Submit to EPA for approval and inclusion into Mariposa County Air District Regulations in the
19 California SIP

¹⁴ Available at: <https://ww2.arb.ca.gov/sites/default/files/classic/technology-clearinghouse/rules/RuleID3649.pdf>

¹⁵ Available at: <https://ww2.arb.ca.gov/sites/default/files/classic/technology-clearinghouse/rules/RuleID3650.pdf>

¹⁶ Available at: <https://ww2.arb.ca.gov/sites/default/files/classic/technology-clearinghouse/rules/RuleID894p.pdf>

¹⁷ Available at: <https://ww2.arb.ca.gov/sites/default/files/classic/technology-clearinghouse/rules/RuleID825.pdf>

Appendix A

List of Categories in RACT SIP Control Techniques Guidelines

	CTG #	CTG Title
1	EPA-450/R-75-102	Design Criteria for Stage I Vapor Control – Gasoline Service Stations
2	EPA-450/2-77-008	Surface Coating of Cans
3	EPA-450/2-77-008	Surface Coating of Coils
4	EPA-450/2-77-008	Surface Coating of Paper
5	EPA-450/2-77-008	Surface Coating of Fabric
6	EPA-450/2-77-008	Surface Coating of Automobiles and Light-Duty Trucks
7	EPA-450/2-77-022	Solvent Metal Cleaning
8	EPA-450/2-77-025	Refinery Vacuum Producing Systems, Wastewater Separators, and Process Unit Turnarounds
9	EPA-450/2-77-026	Tank Truck Gasoline Loading Terminals
10	EPA-450/2-77-032	Surface Coating of Metal Furniture
11	EPA-450/2-77-033	Surface Coating for Insulation of Magnet Wire
12	EPA-450/2-77-034	Surface Coating of Large Appliances
13	EPA-450/2-77-035	Bulk Gasoline Plants
14	EPA-450/2-77-036	Storage of Petroleum Liquids in Fixed-Roof Tanks
15	EPA-450/2-77-037	Cutback Asphalt
16	EPA-450/2-78-015	Surface Coating of Miscellaneous Metal Parts and Products
17	EPA-450/2-78-029	Manufacture of Synthesized Pharmaceutical Products
18	EPA-450/2-78-030	Manufacture of Pneumatic Rubber Tires
19	EPA-450/2-78-032	Factory Surface Coating of Flat Wood Paneling
20	EPA-450/2-78-033	Graphic Arts-Rotogravure and Flexography
21	EPA-450/2-78-036	Leaks from Petroleum Refinery Equipment
22	EPA-450/2-78-047	Petroleum Liquid Storage in External Floating Roof Tanks
23	EPA-450/2-78-051	Leaks from Gasoline Tank Trucks and Vapor Collection Systems
24	EPA-450/3-82-009	Large Petroleum Dry Cleaners

25	EPA-450/3-83-006	Leaks from Synthetic Organic Chemical and Polymer Manufacturing Equipment
26	EPA-450/3-83-007	Equipment Leaks from Natural Gas/Gasoline Processing Plants
27	EPA-450/3-83-008	Manufacture of High-Density Polyethylene, Polypropylene, and Polystyrene Resins
28	EPA-450/3-84-015	Air Oxidation Processes in Synthetic Organic Chemical Manufacturing Industry
29	EPA-450/4-91-031	Reactor Processes and Distillation Operations Processes in the Synthetic Organic Chemical Manufacturing Industry
30	EPA-453/R-96-007	Wood Furniture Manufacturing Operations
31	EPA-453/R-94-032	ACT Surface Coating Operations at Shipbuilding and Ship Repair Facilities
32	59 FR29216; 6/06/94	NESHAPS Aerospace Manufacturing and Rework
33	EPA-453/R-06-001	Industrial Cleaning Solvents
34	EPA-453/R-06-002	Offset Lithographic Printing and Letterpress Printing
35	EPA-453/R-06-003	Flexible Package Printing
36	EPA-453/R-06-004	Flat Wood Paneling Coatings
37	EPA 453/R-07-003	Paper, Film, and Foil Coatings
38	EPA 453/R-07-004	Large Appliance Coatings
39	EPA 453/R-07-005	Metal Furniture Coatings
40	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings
41	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings
42	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings
43	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings
44	EPA 453/R-08-003	Miscellaneous Metal and Plastic Parts Coatings
45	EPA 453/R-08-004	Fiberglass Boat Manufacturing Materials
46	EPA 453/R-08-005	Miscellaneous Industrial Adhesives
47	EPA 453/R-08-006	Automobile and Light-Duty Truck Assembly Coatings
48	EPA 453/B-16-001	Oil and Natural Gas Industry