

**SACRAMENTO METROPOLITAN
AIR QUALITY MANAGEMENT DISTRICT**

STAFF REPORT

**Negative Declaration for
Control Techniques Guidelines**

Coating Operations at Aerospace Manufacturing and Rework Operations

September 19, 2011

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BACKGROUND

The District is designated as a severe nonattainment area for the federal 8-hour ozone standard. The Federal Clean Air Act (CAA) specifies that State Implementation Plans (SIPs) for nonattainment areas must include "reasonably available control measures" (RACM), including "reasonably available control technology" (RACT), for sources of emissions¹. The CAA also provides that for nonattainment areas classified as "moderate" or worse, states must revise their SIPs to include RACT for sources of VOC emissions for each category of VOC sources covered by all Control Techniques Guidelines (CTG) documents issued after November 15, 1990, and prior to the area's date of attainment². EPA defines RACT as "the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility³." EPA periodically publishes information regarding available controls⁴. In developing CTG documents, EPA evaluates, among other things, the sources of VOC emissions and the available control approaches for addressing these emissions, including the costs of such approaches. CTG documents establish the presumptive minimum recommendations for RACT. Areas may deviate from CTG requirements, if justified.

As an alternative to adopting a RACT rule, a state or local agency may adopt a negative declaration documenting that it has no stationary sources or emitting facilities to which the CTG is applicable. The negative declaration must go through the same public review requirements as any other SIP submittal^{5,6}. The negative declarations become part of California's State Implementation Plan at Title 40 of the Code of Federal Regulations (CFR) Part 52, Section 52.222. The Board has previously adopted negative declarations for 22 source categories.

SUMMARY

There are no sources within the District to which the 1997 CTG for Coating Operations at Aerospace Manufacturing and Rework Operations is applicable. The purpose of this staff report is to provide sufficient analysis to support the adoption of a negative declaration for this CTG.

AEROSPACE COATING CTG DESCRIPTION

Title: Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations.

Reference: U.S. EPA Publication No. EPA-453/R-97-004, December 1997.

The CTG applies to the manufacture or rework of commercial, civil, or military aerospace vehicles or components. A model rule is included in the CTG for states and local agencies to adopt. For severe nonattainment areas, the model rule applies to facilities with potentials to

¹ Clean Air Act §172(c)(1).

² Clean Air Act §182(b)(2)(A).

³ Federal Register Notice 44 FR 53761, September 17, 1979.

⁴ Clean Air Act §108(b) and (c).

⁵ Clean Air Act §110.

⁶ Title 40 Code of Federal Regulations §51.102.

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emit 25 tons per year (tpy) or more of VOC. The CTG recommends the following VOC reduction measures: VOC content limits for coating operations; work practices for storage and handling of coatings; and work practices for the handling and use of cleaning materials.

STAFF ANALYSIS

Facilities that emit 25 tons or more of VOC are considered federal major sources in the District and require Title V permits. Staff has verified that none of the District's Title V facilities, with the exception of Aerojet as discussed below, performs aerospace manufacturing and/or rework operations.

There are five permitted sources in Sacramento County that perform aerospace manufacturing and/or rework operations that are within the scope of the CTG: These five facilities, and their potentials to emit for VOC, are Aerojet (17.4 tpy), AAR Composites (2.4 tpy), Cessna Aircraft (2.3 tpy), Composite Engineering (14.8 tpy), and Military Aircraft (0.42 tpy). AAR Composites manufactures polyester resin aerospace parts, and therefore falls within the scope of the CTG, but does not perform coating operations.

The total potential to emit at Aerojet exceeds 25 tons per year. However, aerospace manufacture is just one of the business lines that operate at the Aerojet facility. For aerospace manufacturing and rework, Aerojet's potential to emit is 17.4 tpy of VOC, below the CTG applicability threshold.

Staff searched yellow pages and online business listings, and placed calls to business that might perform aerospace manufacturing or rework to identify additional, unpermitted facilities to which the CTG may apply. No additional facilities were found.

ENVIRONMENTAL COMPLIANCE

Staff finds that the proposed rule is not subject to the California Environmental Quality Act because it is an activity that will not result in a direct or reasonably foreseeable indirect physical change in the environment. (Public Resources Code 21084(a) and Preliminary Review, Section 15060(c)(2) State CEQA Guidelines).

CONCLUSION

Staff's analysis shows that there are no sources within the District to which the aerospace coating CTG applies. No aerospace manufacturing or rework operations large enough to exceed the CTG emissions threshold are anticipated in the future. A negative declaration is proposed for this source category.

Pursuant to section 182(b) of the Clean Air Act, the District should adopt a negative declaration for the following CTG:

Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Operations. U.S. EPA Publication No. EPA-453/R-97-004, December 1997.